

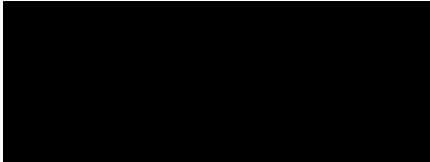
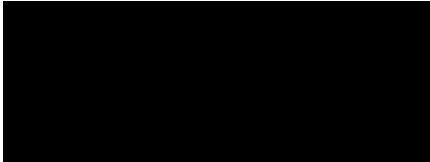
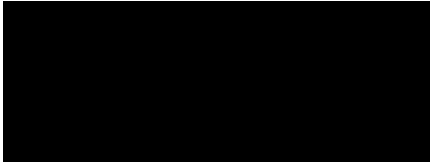
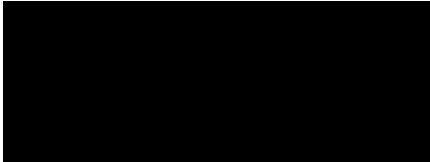
Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

Last Name, First, Middle Swain, Lauren
Address: 8532 N. Ivanhoe St., #208
City, State, Zip Code: Portland, OR 97203
Home/Work Telephone: 
Email Address: lauren@paulsouthwick.com

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

Last Name, First, Middle Maxon, Joanna
Address: 
City, State, Zip Code: 
Home/Work Telephone: 
Email Address: 

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

Name of Institution: Fuller Theological Seminary
Address: 135 N. Oakland Ave.
City, State, Zip Code: Pasadena, CA 91182
Department/School:

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

- Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation and marital status

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Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Joanna was expelled from Fuller Theological Seminary after the school discovered she was married to a woman. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

X I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) The discrimination against Joanna remains ongoing, as her same-sex marriage prevents her from being readmitted to complete her degree program. Although the initial act of discrimination took place more than 180 days ago, Joanna's complaint should not be considered time-barred because of the ongoing discrimination.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

X **Yes**

If you answered **yes**, please describe the allegations in your grievance or hearing, identify the date you filed it, and tell us the status. If possible, please provide us with a copy of your grievance or appeal or due process request and, if completed, the decision in the matter.

See attached declaration

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Complaint Form, Consent Form, and Complaint Processing Procedures

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court for the Central District of California

Date Filed: 11/21/19

Case Number or Reference: 2:19-cv-09969-CBM-MRW

Results of Investigations/Findings by Agency or Court: Complaint dismissed based on religious exemption to Title IX provisions, appeal filed and pending

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Prevent conflicts of interest by separating Title IX officer positions from administrative positions involved in enforcing student codes of conduct/honor code and prevent the sharing of information from Title IX office to administrative offices involved in enforcing student codes of conduct/honor code.

Joanna would also like Fuller Theological Seminary's policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Fuller in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Fuller will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Fuller's non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Fuller, including housing and other programs.

Compensation for emotional distress and economic consequences of expulsion.

Page 4 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/07/2021

(Date)

Jul 8, 2021

(Date)



(Signature)

Joanna A Maxon

Joanna A Maxon (Jul 8, 2021 12:17 CDT)

(Signature of person in Item 2)


Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>McCann, Mackenzie</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|------------------------------|
| Name of Institution: | <u>Liberty University</u> |
| Address: | <u>1971 University Blvd.</u> |
| City, State, Zip Code: | <u>Lynchburg, VA, 24515</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation and gender identity

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Liberty publishes anti-LGBT policies in its Statement on Sexuality and Relationships and Student Honor Code. Because of these policies, Mackenzie could not express their sexual orientation or gender identity out of fear of being disciplined or expelled. Mackenzie felt forced to leave the school in 2018 without graduating, in order protect their mental health. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

X I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
- 2) The Trump administration's policies and statements about religious exemptions to Title IX;
- 3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
- 4) Although the initial act of discrimination took place more than 180 days ago, Mackenzie's complaint should not be considered time-barred because Liberty continues to discriminate against Mackenzie and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

- 9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

- 10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

- 11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Mackenzie would like Liberty’s policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Liberty in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Liberty will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Liberty’s non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Liberty, including housing and other programs.

Compensation for emotional distress and for the economic consequences of needing to leave Liberty without graduating.


- 12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/23/2021

(Date)

Jul 25, 2021

(Date)



(Signature)

Mackenzie J McCann (Jul 25, 2021 19:45 EDT)

(Signature of person in Item 2)

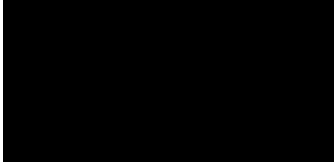
Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>McDonald, Darren</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|------------------------------------|
| Name of Institution: | <u>Fuller Theological Seminary</u> |
| Address: | <u>135 N. Oakland Ave.</u> |
| City, State, Zip Code: | <u>Pasadena, CA, 91182</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

- Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation.

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Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Fuller publishes anti-LGBT policies in its student handbook and does not provide students with clear guidelines regarding what behavior or speech is prohibited by the school. A class Darren attended included anti-LGBT programming. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

X I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) Although the initial act of discrimination took place more than 180 days ago, Darren's complaint should not be considered time-barred because Fuller continues to discriminate against Darren and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

- 9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

- 10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

- 11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Darren would like Fuller’s policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Fuller in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Fuller will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Fuller’s non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Fuller, including housing and other programs.

- 12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/24/21

(Date)

Jul 24, 2021

(Date)



(Signature)

Darren McDonald

Darren McDonald (Jul 24, 2021 16:59 PDT)

(Signature of person in Item 2)

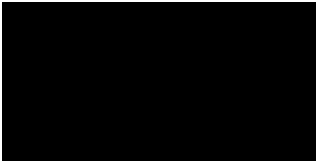
Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>McDonald, Darren</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|---------------------------------|
| Name of Institution: | <u>Westmont College</u> |
| Address: | <u>955 La Paz Rd.</u> |
| City, State, Zip Code: | <u>Santa Barbara, CA, 93108</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation.

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Westmont publishes anti-LGBT policies in its student handbook. Darren was laughed at and humiliated by other students when he played a gay character in a theater production at Westmont. He did not feel comfortable reporting the incident or other problems related to anti-LGBT discrimination because of Westmont's policies. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

X I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) Although the initial act of discrimination took place more than 180 days ago, Darren's complaint should not be considered time-barred because Westmont continues to discriminate against Darren and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Darren would like Westmont's policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Westmont in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Westmont will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Westmont's non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Fuller, including housing and other programs.

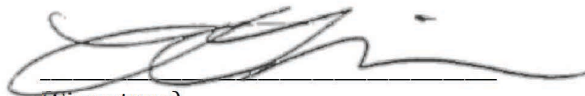
12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/24/21

(Date)

Jul 24, 2021

(Date)



(Signature)

Darren McDonald

Darren McDonald (Jul 24, 2021 17:00 PDT)

(Signature of person in Item 2)





Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

**DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights**

1. Name of person filing this complaint:

Last Name, First, Middle Swain, Lauren
Address: 8532 N. Ivanhoe St., #208
City, State, Zip Code: Portland, OR 97203
Home/Work Telephone: 
Email Address: lauren@paulsouthwick.com

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

Last Name, First, Middle McSwain, Scott
Address: 
City, State, Zip Code: 
Home/Work Telephone: 
Email Address: 

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

Name of Institution: Union University
Address: 1050 Union University Dr.
City, State, Zip Code: Jackson, TN, 38305
Department/School:

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

- Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Union officials told Scott they had been informed that he was gay and that he would be expelled and have all his credits taken away if he did not attend conversion therapy. Union gave Scott vouchers for a specific conversion therapy program. Scott was sexually assaulted by his therapist during one of the conversion therapy sessions and he reported it to Union officials. Union's current student handbook includes anti-LGBT policies including a statement that "The promotion, advocacy, defense, or ongoing practice of a homosexual lifestyle (including same-sex dating behaviors) is also contrary to our community values." Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

X I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) Although the initial act of discrimination took place more than 180 days ago, Scott's complaint should not be considered time-barred because Union continues to discriminate against Scott and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

Yes

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

If you answered **yes**, please describe the allegations in your grievance or hearing, identify the date you filed it, and tell us the status. If possible, please provide us with a copy of your grievance or appeal or due process request and, if completed, the decision in the matter.

See attached declaration.

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Scott would like Union's policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Union in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Union will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Union's non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Union, including housing and other programs.

Compensation for mental and physical health conditions related to sexual assault and other injuries sustained during conversion therapy sessions required by Union.

Page 4 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/24/21

(Date)

Jul 26, 2021

(Date)



(Signature)


Scott McSwain (Jul 26, 2021 11:18 PDT)

(Signature of person in Item 2)


Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Millender, Faith.</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|------------------------------|
| Name of Institution: | <u>Eastern University</u> |
| Address: | <u>1300 Eagle Rd.</u> |
| City, State, Zip Code: | <u>St. Davids, PA, 19087</u> |
| Department/School: | <u>School of Nursing</u> |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Because of Eastern's official statements vaguely implying that LGBT students are not welcome or recognized, Faith is not comfortable revealing her sexual orientation to some professors and staff. Professors at Eastern are bound by a clause prohibiting "homosexual conduct." Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

X I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
- 2) The Trump administration's policies and statements about religious exemptions to Title IX;
- 3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
- 4) Although the initial act of discrimination took place more than 180 days ago, Faith's complaint should not be considered time-barred because Eastern continues to discriminate against Faith and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

- 10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

- 11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Faith would like Eastern’s policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Eastern in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Eastern will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Eastern’s non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Eastern, including housing and other programs.

- 12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/24/21

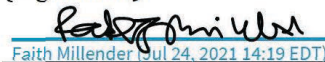
(Date)

Jul 24, 2021

(Date)



(Signature)



Faith Millender (Jul 24, 2021 14:19 EDT)

(Signature of person in Item 2)

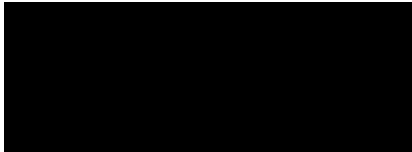
Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

**DISCRIMINATION COMPLAINT
FORM
to the
United States Department of
Education Office for Civil Rights**

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Moulton, Rachel</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|---------------------------------------|
| Name of Institution: | <u>Brigham Young University (BYU)</u> |
| Address: | <u>525 Center St.</u> |
| City, State, Zip Code: | <u>Rexburg, ID, 83460</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

Discrimination **based on sex (specify)**

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures
Discrimination on the basis of sexual orientation

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

BYU-I maintains anti-LGBT policies. Current policy is ambiguous about whether or not same-sex dating will be disciplined. Professors taught anti-LGBT content in many of classes Rachel attended. The LBGT group at BYU-I was not allowed to meet on campus. BYU-I taught that same sex attraction could be "cured." When Rachel realized she could not be "cured", she attempted suicide in her first semester at BYU-I. Rachel felt unwelcome at BYU-I and left the school in 2017. Rachel left again without graduating after returning for an online semester in late 2020 because the discriminatory teachings in the classes Rachel attended were too harmful to her mental health. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) The discrimination against Rachel remains ongoing, as BYU's policies and teaching prevent Rachel from feeling safe enough at BYU to complete her degree program at BYU. Although the initial act of discrimination took place more than 180 days ago, Rachel's complaint should not be considered time-barred because BYU continues to discriminate against Rachel and to promulgate policies and practices that discriminate against LGBTQ+ students.

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Complaint Form, Consent Form, and Complaint Processing Procedures

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Rachel would like BYU's policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by BYU in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) BYU will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) BYU's non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of BYU, including housing and other programs.

Compensation for emotional distress and for the economic consequences of not being able to complete her degree.

Page 4 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/23/2021

(Date)

Jul 23, 2021

(Date)



(Signature)

RachMoulton
Rachel Moulton (Jul 23, 2021 13:50 PDT)

(Signature of person in Item 2)

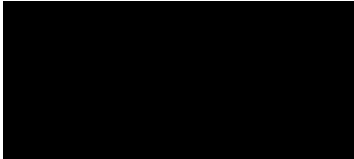
Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

**DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights**

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Mueller, Journey</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|--|
| Name of Institution: | <u>Colorado Christian University (CCU)</u> |
| Address: | <u>8787 W. Alameda Ave.</u> |
| City, State, Zip Code: | <u>Lakewood, CO 80226</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

- Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

CCU publishes anti-LGBTQ+ policies in its student handbook and encourages students to report violations of its policies by other students. Journey's roommates locked her in her dorm room and forced her to confess her sexual orientation, then reported her to school officials. In response, CCU officials placed Journey on academic probation, removed her from her housing, and required her to attend conversion therapy and mentorship meetings. CCU blocked access to LGBTQ+ -affirming resources on their wi-fi service. As a result of this mistreatment, Journey's mental health suffered to the point where she felt compelled to leave CCU before completing her degree. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) Although the initial act of discrimination took place more than 180 days ago, Journey's complaint should not be considered time-barred because CCU continues to discriminate against Journey and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

- 9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

- 10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information is **not required**, but it will be helpful to us.

Not applicable

- 11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Journey would like CCU's policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by CCU in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) CCU will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) CCU's non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of CCU, including housing and other programs.

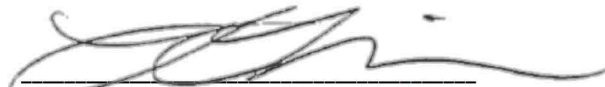
- 12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/29/2021

(Date)

Aug 2, 2021

(Date)



(Signature)

Journey Mueller (Aug 2, 2021 12:40 MDT)

(Signature of person in Item 2)

Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of
Education Office for Civil Rights

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Penales, Veronica Bonifacio</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|--------------------------|
| Name of Institution: | <u>Baylor University</u> |
| Address: | <u>1311 S. 5th St.</u> |
| City, State, Zip Code: | <u>Waco, TX, 76706</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Baylor publishes a statement on sexuality that includes anti-LGBT policies. The statement urges students "struggling" with same sex attraction to seek counseling. Baylor claims in its Civil Rights policy that it is exempt from compliance with select civil rights laws on the basis of religious exemption. As a result of these policies, Veronica does not feel free to express her sexual orientation while attending Baylor. When Veronica reports harassment hateful anti-LGBT statements from other students, officials at the school do not address it and instead tell her to seek counseling. As a result, Veronica has stopped reporting hate speech to the school staff. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) Although the initial act of discrimination took place more than 180 days ago, Veronica's complaint should not be considered time-barred because Baylor continues to discriminate against Veronica and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

Yes

If you answered **yes**, please describe the allegations in your grievance or hearing, identify the date you filed it, and tell us the status. If possible, please

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

provide us with a copy of your grievance or appeal or due process request and, if completed, the decision in the matter.

See attached declaration.

- 9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

- 10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information is **not required**, but it will be helpful to us.

Not applicable

- 11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Veronica would like Baylor’s policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Baylor in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Baylor will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Baylor’s non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Baylor, including housing and other programs.


- 12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/23/2021

(Date)

Jul 24, 2021

(Date)


 (Signature)
 Veronica Bonifacio Penales
 https://secure.na3.adobesign.com/verifier?tx=CBJCHBCAABAASvUVGnWx92NGATNtmfNJPu9rpI9Hq-HG
 Veronica Bonifacio Penales (Jul 24, 2021 17:29 CDT)
 (Signature of person in Item 2)





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DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

Last Name, First, Middle Swain, Lauren
Address: 8532 N. Ivanhoe St., #208
City, State, Zip Code: Portland, OR 97203
Home/Work Telephone: 
Email Address: lauren@paulsouthwick.com

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

Last Name, First, Middle Picker, Jake
Address: 
City, State, Zip Code: 
Home/Work Telephone: 
Email Address: 

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

Name of Institution: Baylor University
Address: 1311 S. 5th St.
City, State, Zip Code: Waco, TX, 76706
Department/School:

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

- Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation.

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Baylor publishes a statement on sexuality that includes anti-LGBT policies. Jake fears that his sexual orientation will affect the way he is treated as a student of Baylor and may subject him to discipline that could affect his career in medicine. An LGBTQ student group at Baylor has been repeatedly denied official status. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) Although the initial act of discrimination took place more than 180 days ago, Jake's complaint should not be considered time-barred because Baylor continues to discriminate against Jake and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

If you answered **yes**, please describe the allegations in your grievance or hearing, identify the date you filed it, and tell us the status. If possible, please provide us with a copy of your grievance or appeal or due process request and, if completed, the decision in the matter.

See attached declaration.

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

- 9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division
Date Filed: 03/29/21
Case Number or Reference: 6:21-cv-00474-AA
Results of Investigations/Findings by Agency or Court: Pending

- 10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

- 11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Jake would like Baylor’s policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Baylor in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Baylor will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Baylor’s non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Baylor, including housing and other programs.

- 12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/23/2021

(Date)

Jul 23, 2021

(Date)



(Signature)


Jake Picker
Jake Picker | Jul 23, 2021 16:25 CDT

(Signature of person in Item 2)

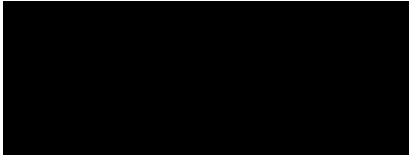
Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Steffen, Megan</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|------------------------------|
| Name of Institution: | <u>Moody Bible Institute</u> |
| Address: | <u>820 N. LaSalle Dr.</u> |
| City, State, Zip Code: | <u>Chicago, IL, 60610</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation

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Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Moody Bible Institute publishes anti-LGBT policies in its student handbook. Moody staff disciplined Megan for attending the Women's march and for statements making statement in support of LGBT rights on social media by requiring her to meet with administrators regularly to discuss her behavior. Moody staff strongly encourage Megan to meet with religious leaders to "work through" her sexual identify. Moody staff told Megan that her graduation may be denied if she did not agree to certain statements about sexual orientation. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) Although the initial act of discrimination took place more than 180 days ago, Megan's complaint should not be considered time-barred because Moody continues to discriminate against Megan and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

- 9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

- 10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

- 11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Megan would like Moody’s policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Moody in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Moody will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Moody’s non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Moody, including housing and other programs.

- 12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/26/21

(Date)

Jul 26, 2021

(Date)



(Signature)

Megan Steffen (Jul 26, 2021 14:46 EDT)

(Signature of person in Item 2)

Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Tidwell-Davis, Daniel Christopher</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|-----------------------------|
| Name of Institution: | <u>Lee University</u> |
| Address: | <u>1120 N. Ocoee St.</u> |
| City, State, Zip Code: | <u>Cleveland, TN, 37311</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

- Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Daniel has stated the following:

"While I was a student at Lee, LGBTQ students were isolated from one another, denied protection against discrimination and harassment, denied permission to form affirming groups, and some students who participated in an underground LGBTQ support group were expelled. I knew a student who was expelled for having a DVD of the feature film Latter Days, a gay themed movie, in his room. I knew of another student who was expelled because he was reported to the school for having been seen on a date with another man over the summer when he was at home in another state.

As a student employee, working as a Resident Assistant in dormitories, I was required to search residents' rooms for LGBTQ materials like films, music, and books, and to watch for any indications of students in same-sex relationships. I was required to report them, with the understanding that this would be grounds for their expulsion.

Lee University had no anti-harassment protections for LGBTQ students at the time I attended. When I enrolled in 2002 at the age of 17, I was required to sign a community covenant that prohibited same-sex sexual activity and that did not include protections against harassment and discrimination on the basis of sexual orientation, gender identity or gender expression. (Lee's "Community Covenant" can be found here: <http://catalog.leeuniversity.edu/content.php?catoid=14&navoid=13830>)

When I worked for Residential Life as a Resident Assistant (2003-2005) residents harassed me with heterosexual pornography, exposed themselves to me, and verbally harassed me as a result of their perception of my sexual orientation. In weekly staff meetings, the supervising Resident Director (now deceased) regularly made sexist and homophobic comments and jokes including using homophobic slurs (as well as racist jokes about a fellow Resident Assistant). One time, while I was a Resident Assistant of a floor in a freshman men's dorm a group of students began throwing pool balls at my bedroom door at 2am. When I opened the door to confront them, the ringleader of the group was completely naked doing a handstand in my doorway with his genitals inches from my face, while 8-10 young men stood behind him howling with laughter. But I did not feel comfortable reporting this incident, due to the way the school has treated other gay students.

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Complaint Form, Consent Form, and Complaint Processing Procedures

When I disclosed my experiences of childhood sexual abuse and my understanding of my sexual orientation to the Director of Student Development, he pressured me into participating in an unofficial conversion therapy group he led that was made up of a few of my peers who were also trying to change their orientation. The Director told our group that our sexual orientation was a result of our childhood sexual abuse. He gave us books to read about the Bible and homosexuality. He repeatedly expressed his disgust with gay sexuality to us. Group members were required to talk about our sexual fantasies, masturbation, pornography use, and sexual activity. Along with “confessing” same-sex desires and sexual activity, we were coached in being more typically masculine and encouraged to think of women sexually. By participating in the group we were ostensibly being protected from suspension or/and expulsion by the Dean of Students. We were led to believe that the Director of Student Development was “looking out for us” by putting us through this therapy group.

In 2006, when the SoulForce Equality Ride visited the Lee campus to advocate for fair treatment of LGBTQ students, school administrators banned the group from entering any buildings and from meeting formally with students. In advance of their visit, the university held mandatory chapel services to reinforce the school’s anti-LGBTQ policies and beliefs. They presented residential life staff with multiple conversion therapy (“ex-gay”) resources, a slide presentation presenting debunked theories about gay and lesbian identity development, and pamphlets for local and national conversion therapy programs to distribute to students. This presentation was given in one of my classes, where we were also warned away from speaking with the Equality Riders when they were on campus.

The same Director of Student Development who led the ex-gay therapy group hired me to step in at the last minute as a Resident Assistant for a High School Summer Honors Camp. I was told that another Resident Assistant might be gay and that he should not be allowed on the same floor with the high school summer honors students without someone else there to watch him and make sure that he didn’t do anything sexual with any of the students. The implication was that someone who was gay and not participating in conversion therapy was potentially a sexual predator.

While under the guidance of the Director of Student Development, I was encouraged to date a female student at Lee University. Later, we were encouraged to marry each other, and the Director conducted pre-marital counseling with us while we were still enrolled as students, just prior to our graduation in 2007. This led to my first marriage, which ended in divorce four years later after I accepted my sexual orientation.

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Complaint Form, Consent Form, and Complaint Processing Procedures

In addition to these incidents which occurred primarily in student life and housing, there was a broader hostile environment promoted across campus due to the requirement to attend chapel services that annually featured homophobic sermons condemning LGBTQ ideas and promoted conversion therapy and sexual orientation change.

In an institutional survey provided to faculty while I was a student, the outside surveyors noted that students at the time were hesitant to visit the on-campus health clinic for STI screenings and sexual health education due to the school's religious stances toward human sexuality. At the time I was a student, and even as I worked in residential life, I was not made aware of the Title IX office. I knew of multiple straight and LGBTQ students who experienced sexual assault and did not report to the university due to fear of being expelled for extra-marital sexual conduct. One gay friend who was sexually assaulted off-campus by another man later sought counseling and was sent to an ex-gay program, and school officials reported this information to the denomination that controls the school, resulting in the gay student losing his ministerial credentials with the denomination.

There was not a school approved LGBTQ affirming group at the time I was a student, and I believe there is no official one now. There have been underground LGBTQ groups and, in the past, school administrators have targeted students for expulsion who participated in or promoted these secret groups on social media."

Lee University's [2020-2021 Student Handbook](#) includes a policy on page 8 stating that "Engaging in any sexual acts expressly condemned in scripture (premarital sex, adultery, and same-sex sexual behavior, etc.) will result in disciplinary consequences that may include suspension or expulsion" as well as other anti-LGBT language.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

X I am requesting a waiver of the 180-day time frame for filing this complaint.

Page 5 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
- 2) The Trump administration's policies and statements about religious exemptions to Title IX;
- 3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
- 4) Although the initial act of discrimination took place more than 180 days ago, Daniel's complaint should not be considered time-barred because Lee continues to discriminate against Daniel and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Prevent conflicts of interest by separating Title IX officer positions from administrative positions involved in enforcing student codes of conduct/honor code and prevent the sharing of information from Title IX office to administrative offices involved in enforcing student codes of conduct/honor code.

Daniel would also like Lee's policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Lee in the same manner

Page 6 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Lee will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Lee’s non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Lee, including housing and other programs, (6) The sanctioning of an LGBTQ student group. (7) Positive and comprehensive LGBTQ healthcare and mental healthcare through the university clinic and counseling center. (8) Campus-wide programming to address the hostile environment, peer harassment, and discrimination faced by LGBTQ students. (9) Full reimbursement of tuition, fees, and related expenses for all former students expelled by Lee for being LGBTQ or for same-sex sexual behavior.

12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/24/21

(Date)

Jul 24, 2021

(Date)



(Signature)

Daniel C. Tidwell-Davis
Daniel C. Tidwell-Davis (Jul 24, 2021 15:49 PDT)

(Signature of person in Item 2)

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**DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights**

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Tidwell-Davis, Justin Michael</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|--------------------------|
| Name of Institution: | <u>Baylor University</u> |
| Address: | <u>1311 S. 5th St.</u> |
| City, State, Zip Code: | <u>Waco, TX, 76706</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

- Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Baylor's policies on homosexuality played a significant role in Justin's motivation to enroll in conversion therapy, which was psychologically damaging to him and interfered with his education. Baylor's sexual misconduct policy listed "homosexual acts" as a disciplinary offense alongside sexual abuse, incest and adultery. Baylor's policies did not describe what sort of acts would be punished, causing Justin to fear discipline for expressing his sexual orientation in any form. Justin witnessed a Baylor professor erasing a message of support for LGBTQIA+ students, a simple "God loves you" with a rainbow, from the sidewalk by scrubbing it off with his foot. While Justin was at Baylor, a gay graduate student was outed and had his scholarship revoked. Justin has spoken with other Baylor alumni who report being subjected to exorcisms by other students, shunned, and told they were mentally ill or demonically possessed for being LGBTQIA+. Some of Justin's friends at Baylor didn't report sexual harassment and assault because they feared that they would be punished for having been assaulted by someone of the same sex.

The existing LGBTQ student group, Gamma Alpha Upsilon (GAY), formerly the Sexual Identity Forum, has existed since the Spring of 2011, and sought to have Baylor charter the organization every year since, without success. In nearly all communications regarding denying GAY's application for an official charter, Baylor's spokespeople and administration have stated that Baylor is committed to the "biblical" understanding of marriage and sexuality, as stated in the Southern Baptist Convention's Baptist Faith and Message of 1963, which shapes Baylor's sexual misconduct policy and statement on human sexuality. However, Baylor's Board of Regents issued a resolution on May 14, 2021 charging Baylor's President, Linda Livingstone, and Baylor's administration with considering the possibility of establishing a new university chartered LGBTQ group that aligns with Baylor's sexual misconduct policy and statement on human sexuality.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

X I am requesting a waiver of the 180-day time frame for filing this complaint.

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
- 2) The Trump administration's policies and statements about religious exemptions to Title IX;
- 3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
- 4) Although the initial act of discrimination took place more than 180 days ago, Justin's complaint should not be considered time-barred because Baylor continues to discriminate against Justin and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

If you answered **yes**, please describe the allegations in your grievance or hearing, identify the date you filed it, and tell us the status. If possible, please provide us with a copy of your grievance or appeal or due process request and, if completed, the decision in the matter.

Justin could find no avenue to resolve these issues while he was a student

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

Page 4 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Prevent conflicts of interest by separating Title IX officer positions from administrative positions involved in enforcing student codes of conduct/honor code and prevent the sharing of information from Title IX office to administrative offices involved in enforcing student codes of conduct/honor code.

Justin would also like Baylor's policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Baylor in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Baylor will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Baylor's non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Baylor, including housing and other programs.


12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/24/21

(Date)

Jul 26, 2021

(Date)



(Signature)

Justin Tidwell-Davis

Justin Tidwell-Davis (Jul 26, 2021 10:21 PDT)

(Signature of person in Item 2)

Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person’s signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student’s behalf, the signature of the child’s parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Vigil, Spencer</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|-----------------------------------|
| Name of Institution: | <u>Seattle Pacific University</u> |
| Address: | <u>3307 3rd Ave W.</u> |
| City, State, Zip Code: | <u>Seattle, WA, 98119</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation and gender identity

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Seattle Pacific University publishes anti-LGBT policies in its Statement on Human Sexuality and Standards of Conduct. Spencer feared revealing his gender identity or having it be discovered. Students and a teacher called Spencer anti-LGBT slurs on campus. A professor gave Spencer a document explaining that he could be subject to loss of his scholarship and other sanctions for knowingly breaking "lifestyle expectations" related to his gender identity. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) Although the initial act of discrimination took place more than 180 days ago, Spencer's complaint should not be considered time-barred because Seattle Pacific continues to discriminate against Spencer and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

- 9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

- 10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

- 11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Spencer would like Seattle Pacific’s policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Seattle Pacific in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Seattle Pacific will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Seattle Pacific’s non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Seattle Pacific, including housing and other programs.

- 12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/24/21

(Date)

Jul 26, 2021

(Date)


(Signature)

Spencer J. Veal (Jul 26, 2021 13:33 PDT)

(Signature of person in Item 2)

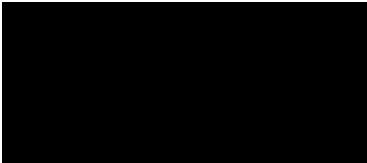
Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Wilson, Lucas</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|------------------------------|
| Name of Institution: | <u>Liberty University</u> |
| Address: | <u>1971 University Blvd.</u> |
| City, State, Zip Code: | <u>Lynchburg, VA, 24515</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Liberty's Statement on Sexuality and Relationships provides vague guidelines indicating that behavior reflecting LGBT identify is a violation of the Student Honor Code. Lucas feared Liberty would punish him for being gay, and enrolled in a conversion therapy program provided and encouraged by Liberty policy as a way to avoid punishment for policy violations related to LGBT identity. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

X I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
2) The Trump administration's policies and statements about religious exemptions to Title IX;
3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
4) Although the initial act of discrimination took place more than 180 days ago, Lucas's complaint should not be considered time-barred because Liberty continues to discriminate against Lucas and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

No

If you answered **yes**, please describe the allegations in your grievance or hearing, identify the date you filed it, and tell us the status. If possible, please provide us with a copy of your grievance or appeal or due process request and, if completed, the decision in the matter.

Not applicable

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

- 9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

- 10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

- 11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Lucas would like Liberty’s policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Liberty in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Liberty will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Liberty’s non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Liberty, including housing and other programs.

- 12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/24/21

(Date)

Jul 27, 2021

(Date)



(Signature)

Lucas Wilson

Lucas Wilson (Jul 27, 2021 09:42 EDT)

(Signature of person in Item 2)

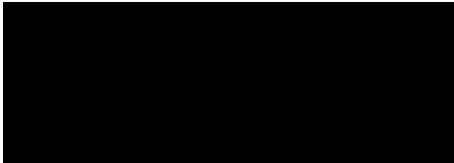
Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

DISCRIMINATION COMPLAINT FORM
to the
United States Department of Education
Office for Civil Rights

1. Name of person filing this complaint:

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Swain, Lauren</u> |
| Address: | <u>8532 N. Ivanhoe St., #208</u> |
| City, State, Zip Code: | <u>Portland, OR 97203</u> |
| Home/Work Telephone: |  |
| Email Address: | <u>lauren@paulsouthwick.com</u> |

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

| | |
|---------------------------------|--|
| Last Name, First, Middle | <u>Wojnarowisch, Audrey</u> |
| Address: |  |
| City, State, Zip Code: | |
| Home/Work Telephone: | |
| Email Address: | |

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

| | |
|-------------------------------|------------------------------|
| Name of Institution: | <u>George Fox University</u> |
| Address: | <u>414 N. Meridian St.</u> |
| City, State, Zip Code: | <u>Newberg, OR, 97132</u> |
| Department/School: | |

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation and gender identity

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

George Fox has vague policies implying that behavior reflecting LGBT identity is not permissible on campus. Due to fear of being punished for their sexual orientation, Audrey hesitated to report that they were stalked and sexually assaulted by another student on campus. After Audrey reported the assault to a resident assistant, Audrey was told that the Area Coordinator would file a Title IX complaint on their behalf, but the coordinator never filed it. Audrey had to continue attending school with their assailant. After a fellow student came out on campus very publicly in 2019, Audrey and other students followed by coming out as LGBT. Soon, the president of student government issued a statement in support of LGBTQ students. However, after several weeks, George Fox President Robin Baker issued a statement that the university prohibits same-sex marriage and all sexual conduct outside of heterosexual marriage, putting Audrey and others who came out at the risk of discipline and exclusion. Please see attached declaration.

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

- 1) the Covid-19 pandemic;
- 2) The Trump administration's policies and statements about religious exemptions to Title IX;
- 3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.
- 4) Although the initial act of discrimination took place more than 180 days ago, Audrey's complaint should not be considered time-barred because George Fox continues to discriminate against Audrey and to promulgate policies and practices that discriminate against LGBTQ+ students.

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

Yes

If you answered **yes**, please describe the allegations in your grievance or hearing, identify the date you filed it, and tell us the status. If possible, please provide us with a copy of your grievance or appeal or due process request and, if completed, the decision in the matter.

See attached declaration.

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court: U.S. District Court - District of Oregon - Eugene Division

Date Filed: 03/29/21

Case Number or Reference: 6:21-cv-00474-AA

Results of Investigations/Findings by Agency or Court: Pending

10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Prevent conflicts of interest by separating Title IX officer positions from administrative positions involved in enforcing student codes of conduct/honor code and prevent the sharing of information from Title IX office to administrative offices involved in enforcing student codes of conduct/honor code.

Audrey would also like George Fox's policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by George Fox in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) George Fox will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual

Page 4 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination
Complaint Form, Consent Form, and Complaint Processing Procedures

activity or other code of conduct violations; and (5) George Fox's non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of George Fox, including housing and other programs.

12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/24/21

(Date)

Jul 24, 2021

(Date)



(Signature)



Audrey Wojnarowisch (Jul 24, 2021 21:05 PDT)

(Signature of person in Item 2)

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 AVERY
BONESTROO**

I, Avery Bonestroo, declare:

- 1. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
- 2. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
- 3. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
- 4. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Avery Bonestroo
Avery Bonestroo

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
Religious Exemption Accountability Project
Paul Southwick Law, LLC
8532 N. Ivanhoe St. #208
Portland, OR 97203
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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 HAYDEN
BROWN**

I, Hayden Brown, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Hayden Brown

Hayden Brown

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 BROOK C

I, Brook C, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Brook C
Brook C

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
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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 TRISTAN
CAMPBELL**

I, Tristan Campbell, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Tristan Campbell

Tristan Campbell

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
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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 SAREN
CRAIG**

I, Saren Craig, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Saren Craig

Saren Craig

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
Religious Exemption Accountability Project
Paul Southwick Law, LLC
8532 N. Ivanhoe St. #208
Portland, OR 97203
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
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) Acting Assistant Secretary for Civil Rights,)
) U.S. Department of Education,)
)
) Defendants.)

Case No. 6:21-cv-00474-AA
**DECLARATION OF ALEX
DURON**

I, Alex Duron, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
4. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Alex Duron
Alex Duron

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
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Timothy R. Volpert (OSB 814074)
Tim Volpert PC
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Portland, OR 97212
Email: tim@timvolpertlaw.com
Phone: 503-703-9054

S
**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,)
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) Plaintiffs,)
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) 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
MORTIMER HALLIGAN**

I, Mortimer Halligan, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Mortimer Halligan

Mortimer Halligan

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
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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 RACHEL
HELD**

I, Rachel Held, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Rachel Held

Rachel Held

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
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Paul Southwick Law, LLC
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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,)
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) Plaintiffs,)
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)
) Defendants.)

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

**DECLARATION OF LAUREN
HOEKSTRA**

I, Lauren Hoekstra, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Lauren Hoekstra

Lauren Hoekstra

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
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Case No. 6:21-cv-00474-AA

**DECLARATION OF JAMIE
LORD**

I, Jamie Lord, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Jamie Lord

Jamie Lord

Paul Carlos Southwick (OSB 095141)
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)
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Case No. 6:21-cv-00474-AA
**DECLARATION OF
CAMERON MARTINEZ**

I, Cameron Martinez, declare:

- 1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
- 2. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
- 3. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
- 4. Building an affirming community at my college/university/alma mater is a religious exercise for me.

5. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Cameron Martinez
Cameron Martinez

Paul Carlos Southwick (OSB 095141)
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Case No. 6:21-cv-00474-AA

**DECLARATION OF JOANNA
MAXON**

I, Joanna Maxon, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
6. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Joanna Maxon

Joanna Maxon

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
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Case No. 6:21-cv-00474-AA
**DECLARATION OF DARREN
MCDONALD**

I, Daren McDonald, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Darren McDonald
Darren McDonald

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
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Case No. 6:21-cv-00474-AA

**DECLARATION OF FAITH
MILLENDER**

I, Faith Millender, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
3. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
4. Building an affirming community at my college/university/alma mater is a religious exercise for me.

5. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Faith Millender

Faith Millender

Paul Carlos Southwick (OSB 095141)
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) Defendants.)

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

**DECLARATION OF JAKE
PICKER**

I, Jake Picker, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
4. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.

5. Building an affirming community at my college/university/alma mater is a religious exercise for me.
6. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Jake Picker

Jake Picker

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
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) Defendants.)

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

**DECLARATION OF MEGAN
STEFFEN**

I, Megan Steffen, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Megan Steffen

Megan Steffen

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
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**IN THE UNITED STATES DISTRICT COURT
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Elizabeth HUNTER; et al., on behalf of)
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) Defendants.)

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

**DECLARATION OF DANIEL
CHRISTOPHER TIDWELL-
DAVIS**

I, Daniel Christopher Tidwell-Davis, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Daniel Christopher Tidwell-Davis
Daniel Christopher Tidwell-Davis

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
Religious Exemption Accountability Project
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) U.S. Department of Education,)
)
) Defendants.)

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

**DECLARATION OF JUSTIN
TIDWELL-DAVIS**

I, Justin Tidwell-Davis, declare:

1. I believe that my sexuality and gender identity are gifts inherent to all people and are to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a sacred union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a moral imperative for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious freedom(s) as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Justin Tidwell-Davis

Justin Tidwell-Davis

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
Religious Exemption Accountability Project
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)
) Defendants.)

Case No. 6:21-cv-00474-AA
**DECLARATION OF LUCAS
WILSON**

I, Lucas Wilson, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Lucas Wilson
Lucas Wilson

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
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)
) Defendants.)

Case No. 6:21-cv-00474-AA
**DECLARATION OF AUDREY
WOJNAROWISCH**

I, Audrey Wojnarowisch, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

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 28th day of July, 2021.

By: s/ Audrey Wojnarowisch
Audrey Wojnarowisch