

EXHIBIT 4

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

GSA Network, Students Engaged in
Advancing Texas, Texas State Teachers
Association, Rebecca Roe, by and through her
next friend, Ruth Roe, and Polly Poe,

Plaintiffs,

v.

Mike Morath, in an official capacity as
Commissioner of the Texas Education
Agency, Houston ISD, and Plano ISD,

Defendants.

Civil Action No.

Declaration of Ruth Roe

Pursuant to 28 U.S.C. § 1746, I, Ruth Roe, declare as follows:

1. I am a Plaintiff in the above-captioned matter. I am suing on behalf of my minor child, Rebecca Roe.¹ Our family lives in Houston, Texas.
2. Rebecca has been a student in Houston Independent School District (“Houston ISD”) since 2018. Rebecca is now a first-year student at the Kinder High School for the Performing and Visual Arts (“HSPVA”) in Houston ISD.
3. Rebecca identifies as queer and lesbian.
4. While in middle school, Rebecca participated in a Genders and Sexualities Alliance

¹ In accordance with Federal Rule of Civil Procedure 5.2(a)(3), all minor Plaintiffs are identified by their initials, and my daughter and I are also filing a forthcoming motion to proceed pseudonymously with the Court to protect our identities.

(GSA)² during sixth and seventh grade. While she was in eighth grade, Rebecca's GSA was inactive because a teacher sponsor was not available. During Rebecca's sixth and seventh grade years, the GSA met once a week before the school day, on school campus. During the meetings, students discussed issues relating to sexual orientation and gender identity, their experiences as members of the LGBTQ+³ community, and many other topics, including their families, friends, and struggles in middle school. Every month, as part of a "Queers and Careers" speaker series, the group brought in an LGBTQ+ adult to discuss various issues, including their coming-out experiences and career trajectory. Participating in the GSA was a highlight of Rebecca's middle school experience and is something she hopes to have access to again in high school through a GSA or similar student organization focused on issues relating to gender identity and sexual orientation. Through her middle school GSA, Rebecca found community and support in her own experience of coming out as an LGBTQ+ student and felt more safe and supported.

5. Although Rebecca is cisgender, she also appreciated learning about gender identity and information related to social transitions at her middle school GSA. When she or other students had questions about names or pronouns, the GSA sponsor and guest speakers were able to answer those questions and provide information and guidance about what it means to be transgender and have a gender identity that differs from someone's sex assigned at birth. Rebecca found this information valuable since she has several transgender and non-binary friends whose deeply held

² GSAs are student-run organizations that unite LGBTQ+ and allied youth to build community and organize around issues impacting them in their schools and communities. GSAs have evolved beyond their traditional role (formerly known as Gay-Straight Alliances) to serve as safe spaces for all LGBTQ+ youth and allies in middle schools and high schools.

³ LGBTQ+ is an "acronym for lesbian, gay, bisexual, transgender, and questioning or queer: an inclusive term used to refer to the diverse forms of gender identity and sexual orientation, and to those whose gender identity differs from the culturally and socially determined gender roles for their assigned sex." *LGBTQ*, APA Dictionary of Psychology, AM. PSYCH. ASS'N (last updated Nov. 15, 2023), <https://dictionary.apa.org/lgbtq>.

sense of gender does not align with their sex assigned at birth. She benefitted from adults being able to share information and guidance about gender identity, including social transition, at her middle school, and hopes to be able to participate in these same kinds of events, activities, and discussions in high school. Rebecca feels strongly that her school should be an accepting and welcoming place, and she and other students benefit from more information and guidance about topics like race, ethnicity, gender identity, and sexual orientation—not less.

6. During middle school, Rebecca also enjoyed educational programs and activities that engaged with sexual orientation, gender identity, race, and ethnicity. Rebecca’s visual arts class partnered with a community art project to create artwork about HIV/AIDS. Rebecca valued learning about the history of HIV/AIDS and how members of the LGBTQ+ community lost loved ones to the disease. Her middle school also organized an all-school Black History performance in which students participated. Rebecca enjoyed watching the performance because it served as a chance to learn more about Black history that was not covered in her history class. Rebecca also valued her middle school’s Hispanic Heritage performance, which celebrated notable Hispanic artists and art forms.

7. Rebecca and I object to S.B. 12 because it burdens her ability to participate in activities and programming regarding race, sexual orientation, or gender identity, including a GSA. S.B. 12’s GSA Ban bars my child from associating with other LGBTQ+ students at school and joining or forming a recognized student club based on sexual orientation or gender identity. The law also prevents any school employee, contractor, or third party from providing any “instruction” or “guidance” about gender identity or sexual orientation, which is something that Rebecca enjoyed receiving from guest speakers at her middle school GSA.

8. As a parent who is active in my child’s school as both a “third party” and

“volunteer,” S.B. 12 suppresses my own speech and prevents me from engaging with my child and other students in trainings, programs, and activities that reference race, gender identity, and sexual orientation. I often volunteered with Rebecca’s GSA when she was in middle school. I would bring donuts for the GSA’s morning meetings, I hosted a table at the school’s open house, and I purchased Pride-themed swag to share with the GSA and its student members. I hope to support a similar student organization at Rebecca’s high school, but this would not be possible if GSAs and similar clubs are banned in Houston ISD. Although some Texas lawmakers called S.B. 12 a “Parents’ Bill of Rights,” it infringes on my rights as a parent because it prohibits me and my child from speaking and learning about topics that the Legislature wants to silence and suppress.

9. Rebecca and I also object to S.B. 12 because it prohibits her from participating in activities, programs, and trainings that reference race, color, ethnicity, gender identity, or sexual orientation. Rebecca benefited from extracurricular activities where she could learn about and discuss these topics in her middle school, and she seeks to learn from and actively participate in similar programs and activities in high school. But S.B. 12 threatens to significantly interfere with and substantially burden my child’s freedom of speech, expression, and association.

10. Rebecca intends to participate in the GSA group or similar clubs at HSPVA where students, teachers, and guest speakers can actively discuss and learn about issues relating to gender identity and sexual orientation. Rebecca benefitted from her middle school’s GSA and wants a similar experience during high school. Although Rebecca does not know if there is an active GSA offered at her high school and clubs at her school do not start until September, a Pride @ PVA group was listed on her high school’s website in the past but it is no longer named as a club for the current school year. Rebecca would like to join or start a GSA at her high school this school year, but she fears that S.B. 12 now prevents her from doing so. If Rebecca is prevented from joining or

starting a GSA because of S.B. 12, her ability to organize, speak with, and connect with other students in a school club based on sexual orientation and gender identity will be suppressed.

11. Rebecca also seeks to actively participate in her high school's diversity programs that will likely be banned by S.B. 12. These events include (1) Carnaval: Hispanic Heritage & History Festival, (2) Alphabet Soup: LGBTQ+ Festival, (3) Koffee House: African American Heritage Festival, (4) VenUS: Women's History Festival, and (5) 790 Night Market: Asian American Heritage Festival. The purpose of these festivals is to highlight and showcase diversity at HSPVA, create performance and leadership opportunities for students, and promote student involvement in their community. Rebecca hopes to actively participate in VenUS and Alphabet Soup because, given Rebecca's identity as a girl and a queer person, Rebecca would like the opportunity to celebrate the history of women and the LGBTQ+ community by creating art and organizing events for the festivals. Rebecca is also looking forward to attending Carnaval, Koffee House, and 790 Market to learn more about Hispanic, African American, and Asian American history, culture, and art. Rebecca wants to attend HSPVA because the school offers incredible art education and celebrates diversity. Rebecca thinks it is important to learn about the communities that have been discriminated against in the visual and performing arts world and our broader society so that Rebecca can be part of the effort to create a more inclusive environment.

12. As a parent active in my daughter's school, I also hope to volunteer at HSVPA's diversity programs. But my ability to serve as a "volunteer" in activities and programs that explicitly reference race, gender identity, or sexual orientation could be derailed by S.B. 12.

13. When I explained to Rebecca that S.B. 12 might prohibit HSPVA from hosting the Diversity Series and allowing a GSA, Rebecca felt angry, upset, and confused. Rebecca feels that the state of Texas is trying to bar her from expressing her identity, speaking about issues she cares

about, building community with other students, and learning about other cultures and histories.

14. Although we do not yet know how Rebecca's school will enforce S.B. 12, she already feels this law suppresses her ability to speak with teachers about prohibited topics, including social transitioning. Even though Rebecca was able to speak with teachers about this topic in middle school and try to foster a supportive school environment for her transgender and non-binary friends, she can no longer engage in discussions about social transitioning with teachers for fear that they may be disciplined and accused of violating S.B. 12.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on August 22, 2025.

Ruth Roe

Ruth Roe