

EXHIBIT 3

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

GSA Network, Students Engaged in
Advancing Texas, 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, Katy ISD, and Plano
ISD,

Defendants.

Civil Action No.

Declaration of Cameron Samuels

Pursuant to 28 U.S.C. § 1746, I, Cameron Samuels, declare as follows:

1. I am the Executive Director of Students Engaged in Advancing Texas (“SEAT”). I have served in this role since SEAT’s founding in 2022.
2. SEAT is a nonpartisan and nonprofit grassroots civic organization. It is a youth-led organization whose mission is to empower youth through hands-on civic engagement, advocacy, and leadership development to address systemic inequities and drive change in Texas communities.
3. SEAT works with schools, educators, student organizations, students, and parents across Texas in a variety of ways to advance its mission, including by providing information and resources to Genders and Sexualities Alliances (“GSAs”)¹ and other clubs in Texas schools. We also engage in programs and activities that reference race, ethnicity, gender

¹ 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.

identity, and sexual orientation; and we provide information and resources on these topics and other issues of public concern.

4. SEAT brings claims in this lawsuit on behalf of itself and its members. S.B. 12's prohibitions threaten to inhibit SEAT's programs and activities by preventing schools, educators, and student organizations from partnering with us, while also inhibiting our ability to speak and associate with students and teachers through programs and activities in public and charter schools.

SEAT's Structure and Membership

5. SEAT is governed by our bylaws, which were formalized in 2024. The bylaws state that we exist to "empower Texas youth through hands-on civic engagement, advocacy, and leadership development to address systemic inequities and drive change in their communities."
6. For SEAT and our members, seeking to address systemic inequities and driving change is impossible without acknowledging race, ethnicity, gender identity, and sexual orientation. We incorporate and discuss racial justice and LGBTQ+² justice throughout our programs, activities, and events.
7. SEAT is governed by directors, who collectively serve as both the operational leadership and our board of directors. This integrated structure ensures that those responsible for day-to-day operations are also accountable for strategic decision-making and governance.
8. SEAT also has associates who contribute to SEAT's mission by supporting daily operations within their assigned departments. Associates work on specific projects and tasks that advance the organization's goals.
9. SEAT is comprised of approximately 282 members, who form the backbone of our organization and provide input and feedback to inform our organization's strategies and initiatives.
10. SEAT's members are mostly high school and college students in Texas who seek to engage in advocacy and policymaking on issues of public importance. We also have members in graduate school, as well as recent high school or college graduates.
11. SEAT provides our members with hands-on opportunities for engaging in advocacy, legislative efforts, and education, thereby driving civic transformation and bettering Texas communities.
12. SEAT has members in at least 30 school districts and charter schools throughout Texas, including in Houston and Katy ISD.

² 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, American Psychological Association (last updated Nov. 15, 2023), <https://dictionary.apa.org/lgbtq>.

13. SEAT's members reflect the diversity of Texas in every way and come from many different backgrounds in terms of race, religion, gender identity, sexual orientation, national origin, wealth, disability, and more.
14. While anyone can sign up for updates through our website, SEAT's membership list is comprised only of people who are invited to join our online messaging platform.
15. Once people join our online messaging platform, they are able to actively participate in discussions and help guide our organization through the online messaging platform.
16. SEAT's members all have connections to Texas and either currently attend or recently attended school in Texas.
17. We regularly communicate with our members through virtual meetings open only to them, as well as through our online messaging platform, social media, emails, and website.

SEAT's Activities Generally

18. SEAT and our members engage in speech on matters of public concern at school districts, charter schools, and private schools throughout Texas and before the State Legislature.
19. We support students in various school districts and charter schools to be advocates and leaders in their schools and communities.
20. As part of this support, SEAT provides know-your-rights information to students, educators, and others both on and off school district property. We provide know-your-rights lanyard cards to students and teachers that contain information about Title IX's prohibition on discrimination related to sexual orientation and gender identity, and the Civil Rights Act's prohibition on discrimination related to race, color, or sex.
21. Many teachers and students carry and wear these lanyards at schools, and teachers often share this information with their students.
22. The lanyards include a link to our student resource hub with information that references race, gender identity, and sexual orientation, and includes information about upcoming civic engagement events, and information about joining SEAT. To date, SEAT has distributed over 1,000 lanyard cards with this information.
23. SEAT also shares resources from partner organizations with students and educators, including LGBTQ+ mental health resource fliers and guides on fighting the banning of books related to LGBTQ+ and racial diversity issues. For example, we share a Student Advocacy Guide from the Children's Defense Fund that explains how some school boards have "tried to ban books, outlaw mask mandates, and write people of color and queer people out of our history books."
24. SEAT's members regularly testify at school board meetings and state legislative sessions regarding a variety of issues pertaining to racial justice, LGBTQ+ rights, and students' rights to free speech and expression at school. SEAT encourages and prepares students to exercise leadership in their education, lives, and political activities to make change in their communities.

25. SEAT often receives and answers questions from teachers and schools seeking guidance about how to navigate policies around LGBTQ+ issues and clubs like GSAs. We sometimes communicate with educators through their school email addresses and discuss issues with school employees relating to race, ethnicity, color, sexual orientation, and gender identity, including social transitioning.
26. Some school districts have civic engagement officers, who help SEAT coordinate with students and clubs in their district. These officers often share information about SEAT's upcoming activities and events with students, including our activities that reference race, sexual orientation, and gender identity.
27. Speaking directly with educators is important to SEAT because it gives us continuity when interacting with certain schools and school districts. Even though we are a student-run organization that often speaks with students directly, it is sometimes easier to share information with teachers who then pass it on to students.
28. Some of the information that we share with educators and students could be viewed as relating to social transitioning, at least as this term is vaguely and broadly defined by S.B. 12. Teachers have attended our trainings and shared information about their own experiences with gender identity, including the use of pronouns that differ from their sex assigned at birth. We also share resources about laws prohibiting discrimination based on gender identity, which references topics relating to social transitioning.
29. One of our recent projects is to share information with students and teachers about web filtering and surveillance at school. As part of this project, we created a website that mentions the filtering out of queer, trans, Black, and Brown voices through school website filtering. We have been sharing this website with teachers in Texas high schools who teach AP Government or U.S. History, who in turn share it with their students. We also share this website with teacher sponsors of school clubs that might be interested in this topic.

SEAT's Work with GSAs and Other Clubs

30. In addition to collaborating directly with teachers, SEAT works with and through GSAs to engage in student support, advocacy, and leadership development.
31. SEAT has provided information and resources to GSAs, especially about federal and state laws and local school board policies, including how these laws and policies relate to racial and LGBTQ+ justice.
32. SEAT also helps its members create and maintain GSAs at their schools. For example, in Katy ISD, we connected our members active in GSAs to the leaders of GSAs in other schools, thereby helping students share information with each other and advocate for more inclusive policies in Katy ISD. We have also helped students identify faculty sponsors for GSAs, connected them with the GSA Network, and distributed know-your-rights information about the Equal Access Act and school district policies.

33. Several SEAT members are active in, and have recently been leaders of, GSAs at their schools.
34. SEAT has also worked with GSAs to hold events on school district property where we discuss issues involving gender identity, sexual orientation, and race. In Cypress-Fairbanks ISD, we held a poster-making party and training with students, parents, and educators to prepare them to testify before the district's school board meeting. During the three events we held, we provided information and resources about the district's proposed policies impacting LGBTQ+ students and seeking to censor discussions of race (and other topics) from certain textbooks. We distributed know-your-rights resources, including our lanyards, at these events, and also partnered with students in debate clubs to help them express their views to the school board.
35. In Houston ISD, we have attended school board meetings to advocate against the closure of district libraries. We partnered with Community Voices for Public Education-Houston to hold a read-in, where we distributed and read books explicitly mentioning topics of racial justice, sexual orientation, and gender identity on Houston ISD property.
36. We also worked with students, parents, and educators in Conroe ISD to help them organize in response to proposed anti-LGBTQ+ policies and we distributed know-your-rights lanyards, lapel pins, stickers, and tote bags on school district property.
37. We also attended school board meetings in Fort Bend ISD, where we distributed our lanyards, transgender pride flags, and other resources on school district property, and we partnered with students, teachers, and educators to push against anti-LGBTQ+ policies in the district.
38. In Katy ISD, we have worked with a network of GSAs to distribute books that were removed from school libraries because they feature characters and topics relating to race, gender identity, and sexual orientation. Many of the books we distribute include works that explicitly discuss race, ethnicity, color, gender identity, and sexual orientation.
39. When Katy ISD proposed an anti-LGBTQ+ school board policy in August 2023, we partnered with a Sexualities and Genders Alliance (SAGA), a Katy ISD GSA, to help prepare students to speak at the board meeting. This is where we first distributed our know-your-rights lanyards, which students took to their campuses and distributed throughout their high schools in Katy ISD. Several teachers in Katy ISD also took our lanyards and gave them out to students at school. Since that policy was enacted, SEAT and our members have continued to attend Katy ISD school board meetings, urge the district's leaders to adopt more inclusive policies, and distribute know-your-rights information on Katy ISD campuses.
40. SEAT also works closely with other student organizations, including those based on race, ethnicity, or heritage. For example, SEAT has collaborated with Black student unions and clubs based on Latino heritage to engage in leadership and advocacy projects. One such club, the La Raza Student Alliance in Houston ISD, attended our recent Advocacy Day with their faculty sponsor. SEAT has members who are a part of these organizations in

their schools. We also intend to keep engaging in similar activities in each of the school districts where we have held events, including in Houston ISD and Katy ISD, and we hope to continue expanding our programs to keep supporting our members and student organizations at each of these districts.

SEAT's Advocacy Days

41. Our biggest events are our Advocacy Days, where we partner with schools, teachers, and student organizations to bring students to the Texas Capitol to interact directly with lawmakers and learn about the policymaking process. Our largest Advocacy Day is the SEAT Summit.
42. At the most recent SEAT Summit in April 2025, we brought approximately 300 attendees, including students and SEAT members, to the Texas Capitol to engage lawmakers and each other on matters of public concern, including issues relating to race, ethnicity, gender identity, and sexual orientation.
43. The Summit is a nonpartisan event that was recognized as an official field trip by several schools. Because it was held on a week day, student attendees required school approval for an excused absence and were typically accompanied by teacher chaperones from their school districts and bus drivers that took them to Austin.
44. This April, students from Houston ISD and Plano ISD, among others, attended our Summit. Some of these students had school chaperones with them and transportation organized by their respective school districts.
45. While all of the programming was student-led, teachers helped chaperone our Summit and joined students in discussions about issues of public concern—including those relating to race, ethnicity, gender identity, and sexual orientation—before, during, and after the event.
46. One of the clubs that attended our Summit was the La Raza Student Alliance from Houston ISD. They were accompanied by their teacher advisor and other chaperones, and students in that club joined other attendees in actively discussing bills and issues before the Texas Legislature, including those concerning race, ethnicity, gender identity, and sexual orientation.
47. The keynote speaker at our Summit this year was a transgender woman who spoke about her own gender identity. We also had panel discussions about diversity, equity, and inclusion, protecting immigrant communities, LGBTQ+ erasure, voter suppression in Black and Brown communities in Houston, and racial disparities in youth discipline and surveillance.
48. We intend to hold another Advocacy Day next spring, where we hope to continue partnering with schools, teachers, and clubs to help bring students to our events and to be able to keep discussing issues of public concern, like race, sexual orientation, and gender identity. In order to make these events a success, we rely on school districts and charter

schools to provide transportation and excused absences for students, and on school employees to help chaperone and supervise our events.

SEAT's Fellowship Program

49. SEAT has also created a Fellowship Program that provides mentorship and leadership development for student organizing. The fellowship is focused on fostering LGBTQ+ and racial diversity and acceptance in schools. As part of our Fellowship Program, SEAT has sponsored 27 fellows for the upcoming school year. Twenty-two of our fellows attend public high schools and five are in college, and they come from rural, urban, and suburban areas across our entire state.
50. Approximately 70% of fellows in this year's cohort are queer or questioning. Starting this October, SEAT's fellows will each create a capstone project that involves creating a more welcoming and inclusive environment in their school community. Some capstone projects will involve starting or expanding a GSA, whereas others will involve working with educators, parents, and community members to discuss topics of race, gender identity, and sexual orientation in schools. The fellowship program runs until April and participants will showcase their capstone projects at the SEAT Summit, ideally with the approval and facilitation of their schools.

Harms to SEAT Itself

51. Senate Bill 12 ("S.B. 12") diminishes SEAT's freedom of speech and association because it limits our ability to continue collaborating with school districts, educators, student clubs, and students to fulfill our mission and engage in our programs and activities.
52. Prohibiting school districts and charter schools from authorizing GSAs will negatively impact SEAT because it will stop us from working with GSAs to share information and resources directly with students. Without GSAs, we will no longer have teacher GSA sponsors who provide continuity and with whom we can share resources and information. Without these clubs and GSA sponsors, it will be much harder to communicate directly with students and engage in our events or activities on school campuses.
53. Barring any educator or third party from providing any "instruction, guidance, activities, or programming regarding sexual orientation or gender identity to students enrolled in prekindergarten through 12th grade" also directly harms SEAT because it prevents us (as a third party) from continuing to speak about issues relating to gender identity and sexual orientation in our programs and activities that take place on school district property and at our events that are recognized as field trips by schools in Texas.
54. This part of S.B. 12 will make it much more difficult for us to share resources and know-your-rights information with educators, student clubs, and students themselves because much of our information explicitly references gender identity and sexual orientation and could be considered "instruction, guidance, activities, or programming" by schools throughout the state.

55. SEAT is also harmed by S.B. 12's prohibition on school employees from providing "any information" to students about social transitioning. Because many of our resources mention gender identity and issues relating to social transitions, school employees will likely no longer accept our resources and information or share them with students.
56. And because "assisting" and "social transitioning" are so vague and broad, school districts, charter schools, and their employees might no longer permit students to attend our events where gender identity is discussed, including our recent Summit where we featured a transgender keynote speaker.
57. S.B. 12's prohibition of school employees, contractors, and volunteers from "developing or implementing policies, procedures, trainings, activities, or programs that reference race, color, ethnicity, gender identity, or sexual orientation" also harms SEAT's programs and activities. As volunteers ourselves, we would no longer be permitted to develop or implement any policy, procedure, training, activity, or program that mentions these topics "at, for, or on behalf of" a school district or charter school. Thus, we could no longer hold the trainings that we have facilitated for students on school district property where we discuss issues related to race, gender identity, or sexual orientation.
58. This restriction will also make it far more difficult for SEAT to hold events off campus, including our Advocacy Days. Because we rely on school districts and charter schools to provide transportation and excused absences for students to attend our events that explicitly reference race, gender identity, and sexual orientation, S.B. 12 will make it impossible for school employees to help chaperone our events without risking violating the law.
59. Without the active support of schools, educators, and student clubs like GSAs, far fewer students would be able to attend our Summit and other events. With fewer attendees, we will not be able to effectively fulfill our mission to empower youth through hands-on civic engagement, advocacy, and leadership development to address systemic inequities and drive change in Texas communities.
60. Without being able to partner directly with schools, educators, and student clubs, we will also have a tougher time attracting members to join SEAT and fulfilling our mission.
61. Teachers, GSAs, and schools will be unable to distribute SEAT's advocacy and informational materials to students about gender, sexual orientation, and racial diversity, who will in turn be less aware of their rights and our existence as an organization.
62. If not for S.B. 12, SEAT would continue to engage in all of the activities described above.

Harms to SEAT's Members

63. S.B. 12 also harms SEAT's members, including those in Houston ISD, by preventing students in public and charter schools from receiving information and resources about topics relating to race, ethnicity, color, gender identity, and sexual orientation, as well as distributing them to others within their schools. As educators are no longer able to share

our materials that reference these topics directly with students, SEAT members will lose access to information and be deprived of enriching conversations with educators, including those about race, LGBTQ+ issues, and social transitions. SEAT members will also lose the ability to speak on these issues by sharing and distributing this information on behalf of the organization.

64. SEAT's members will also be deprived of their ability to form student organizations "based on sexual orientation or gender identity." SEAT's members are active in GSAs that would be banned by S.B. 12 and at least one member actively wants to start a GSA. But we fear that SEAT members will be prevented from joining or forming GSAs if this restriction of S.B. 12 is not enjoined.
65. Without the support of their schools being able to "implement" programs and activities that reference race, ethnicity, color, gender identity, or sexual orientation, SEAT's members will have a much more difficult time attending SEAT events and engaging in programs, activities, and trainings that reference race, sexual orientation, and gender identity. They will likely have to arrange their own transportation to our Advocacy Days and might not have their absences excused by their schools. They also would need to find other adults to accompany them if their teachers are not able to serve as chaperones at our events for fear of violating S.B. 12. Our members will have their ability to learn impeded by S.B. 12, as well as their right to speak and actively engage in trainings, programs, and activities previously permitted in Texas schools.
66. SEAT's members are also negatively impacted by the Social Transition and Don't Say LGBTQ+ Bans. Both of these sections are so vague that our members do not know what is prohibited, and SEAT members are now afraid to speak with their teachers or other school employees about issues relating to gender identity or social transitioning for fear of getting them in trouble. Transgender members of SEAT are especially harmed by the Social Transition Ban as educators are now prohibited from "assisting" their social transition process and may be unable to fully support our transgender members as their full and authentic selves. Our members also want to actively discuss LGBTQ+ issues with school employees and third parties, including SEAT itself, but the Don't Say LGBTQ+ Ban now makes this impossible in any activity or program involving students in pre-K through twelfth grade.

SEAT's Diversion of Resources due to S.B. 12

67. SEAT has historically connected with students through clubs focused on LGBTQ+ and racial diversity, including GSAs, or through teachers who share information about SEAT with their students. S.B.12 will make it more difficult for students to access information about SEAT and its civic engagement opportunities. To continue to reach students, SEAT will have to increase and reallocate resources to reaching students in other ways, such as increasing online outreach and/or outreach at events that are off campus. Overall, SEAT

will be able to reach fewer students, and the outreach it does will be less effective and more financially burdensome for the organization.

68. Because of the ban on GSAs, SEAT will also have to reallocate resources towards trying to find alternative spaces where students can safely associate with each other and discuss issues relating to race, gender identity, and sexual orientation outside of schools.
69. SEAT will also have to reallocate resources to answer increased questions from students, teachers, schools, and school districts about changes under S.B. 12.
70. Because of S.B. 12, SEAT will have to create new know-your-rights information for students and create new guidance for teachers and schools about how to navigate LGBTQ+ policies in light of this law.
71. Because of these resources being diverted as a result of S.B. 12, SEAT is going to have less time and resources to do projects it had previously planned, and we are unlikely to be able to conduct some of them at all because of S.B. 12, such as in-person community workshops, virtual webinar trainings, leading sessions at K-12 after school club meetings, and establishing chapter student organizations at universities.

This Declaration is made pursuant to 28 U.S.C. § 1745. I declare under penalty of perjury that the foregoing is true and correct.

Signed on August 26, 2025.



Cameron Samuels