

EXHIBIT 7

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

GSA Network, Students Engaged in
Advancing Texas, Texas AFT, Texas State
Teachers Association, Rebecca Roe, by and
through her next friend, Ruth Roe, Adrian
Moore, by and through his next friend, Julie
Johnson, 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. 4:25-cv-4090

Declaration of Julie Johnson

Pursuant to 28 U.S.C. § 1746, I, Julie Johnson, declare as follows:

1. I am a Plaintiff in the above-captioned matter. I am suing on behalf of my minor child, Adrian Moore¹ and am bringing claims against the Commissioner and Katy Independent School District (“Katy ISD”). Through this lawsuit, Adrian seeks to enjoin the enforcement of Senate Bill 12 (“S.B. 12”)’s GSA Ban, Inclusivity Ban, Social Transition Ban, and Don’t Say LGBTQ+ Ban against him while also seeking declaratory and nominal relief because these provisions violate Adrian’s First and Fourteenth Amendment rights, as well as his rights under the federal Equal Access Act, 20 U.S. Code § 4071.

¹ Adrian is not my child’s legal name but is the name he goes by in every aspect of his life. Adrian’s legal name is already known by Katy ISD and will be shared with all other Defendants in this case, subject to a protective order from the Court.

Background

2. Adrian has been a student in Katy ISD since seventh grade, when we moved to the area during the 2020-21 school year. Adrian is now a senior in Katy ISD and is 17 years old.

3. Adrian is a gay, transgender boy and uses the pronouns he, him, and his. His gender identity is deeply important to him because it reflects who he is and is how he is known by his teachers and friends.

4. During Adrian's sixth grade year, he told me that he might be queer. I told him that I supported him no matter what since my priority is for my kids to be happy, healthy, and successful.

5. Around the middle of seventh grade, Adrian told me that he is transgender and wanted to start going by the name Adrian. I supported Adrian in this decision and asked each of his teachers in Katy ISD to start calling him Adrian. Each of his teachers complied and started using his name in all classroom discussions, extracurricular activities, and other school events. Although Adrian's legal name still appears in his electronic school records, his teachers and administrators in Katy ISD have generally respected his chosen name by calling him Adrian for nearly the last five years. They have also consistently used he/him pronouns to refer to my son.

6. Adrian is also autistic and has anxiety, which are both recognized as physical and mental impairments by Katy ISD. Adrian has had a Section 504 Plan since 2022. Katy ISD refers to Adrian in the 504 Plan by his name and uses he/him pronouns.

Adrian's Activities in Katy ISD

7. Adrian has thrived in Katy ISD schools while being recognized as his true and authentic self. Adrian excels in school, has been enrolled in honors or Advance Placement classes since enrolling in Katy ISD in Grade 7, and he has actively participated in choir, theater, debate, a

Pride/Diversity Club, a Dungeons & Dragons Club, and the Art National Honor Society.

8. Adrian's favorite subjects are English and History and he aspires to study musical theater and psychology in college. He is most passionate about acting and would love to be an actor someday, but he is also interested in becoming an Applied Behavior Analysis (ABA) therapist.

9. Adrian's primary extracurricular activity is choir. He has loved to sing from even before he started to talk, and he has participated in choir since third grade. As a member of his school's varsity and jazz choirs, Adrian sings as both Alto and Tenor and is permitted to wear a suit at concerts with other boys, while the girls in choir wear dresses. Throughout his years at Katy ISD, Adrian's choir directors have been supportive of his social transition and have allowed him to sing and dress in accordance with his gender identity. All of Adrian's choir directors, as well as his teachers, have also consistently respected his name and pronouns.

10. Adrian also loves to act and to perform in theater and musical theater. Towards the end of his seventh-grade year with Katy ISD, Adrian performed in a male role in 10 Ways To Survive The Zombie Apocalypse. The playbill for this show listed his name as Adrian. In eighth grade, Adrian even earned the award for Best Actor in the entire school district for his role as Chris in Boxes. Over the past five years, Adrian has continued participating in theater at Katy ISD and has performed in theatrical roles in his male identity, including Tom in Unplugged and Dad in Bedtime Stories as Told By Dad. Even when Adrian played the female role of Sophie in Mama Mia the playbill listed the role as played by Adrian. Outside of school, Adrian had performed in several additional roles including as the dentist in Little Shop of Horrors, the sheriff in Batboy, Mr. Cauldwell in Urine Town, and Vice Principal Douglas Panch in Putnam County Spelling Bee. Like many actors, Adrian has also performed in female roles as well, but his theater teachers and

fellow students have supported and respected his gender identity.

11. During his freshman year in high school, several of Adrian's friends started the process of rebuilding a Pride Club, which had previously been waning at his school. Adrian joined them and became active in Pride Club at the start of his sophomore year. Participating in the Pride Club gave Adrian a chance to connect with other LGBTQ+ students and be himself in a safe and supportive space. Students in Pride Club supported each other's LGBTQ+ identities, discussed topics of gender identity and sexual orientation, and welcomed allies and non-LGBTQ+ students as well. Adrian and other students relied on the Pride Club as a place to congregate and discuss LGBTQ+ issues, while also hanging out, playing board games, doing karaoke, and engaging in activities like making bracelets. The students checked in on each other and supported each other while also teaching each other single-slide LGBTQ+ history lessons, which Adrian helped lead and initiate. The Pride Club also had a faculty sponsor who supported students in the club.

12. During Adrian's sophomore year, school administrators in Katy ISD required the Pride Club to change its name to the "Diversity Club." To Adrian's knowledge, they did this to comply with Katy ISD's anti-LGBTQ+ policy enacted in August 2023 that prohibits certain concepts of "gender identity."² Despite this name change, the Diversity Club was able to continue the same activities that took place in Pride club, and Adrian was still able to congregate with his friends and discuss topics relating to gender identity and sexual orientation with his friends into

² Pursuant to Katy ISD's FA (Local), "No course of instruction, unit of study, materials, instructional materials, or any other curricular or District-sponsored extracurricular offerings adopting, supporting, or promoting gender fluidity will be used or introduced in any District classroom." FA (Local), Katy ISD (Aug. 28, 2023), <https://pol.tasb.org/PolicyOnline/PolicyDetails?key=594&code=FA#localTabContent>.

This policy also states that "District staff will not promote, require, or encourage the use of pronoun identifiers for students or any other persons in any manner inconsistent with the biological sex of such person" but that "In the event a minor student with the written consent of such student's parent or an adult student specifically, in writing, requests or directs the use of specific pronouns for that particular student, District staff interacting with the student may comply with such request."

and throughout his junior year.

13. Adrian's school regularly has spirit days and special events that sometimes reference topics of race and ethnicity. For example, his school had a "Cultural Night" last school year that included performances by an African Ghanaian Drums and Dance group, a French Cirque or Zouk team, a Japanese Contemporary Dance group, a Mexican Ballet Folklorico, a Mariachi band, and a Spanish Flamenco ensemble. These same groups explicitly referencing race and ethnicity also performed at a Cultural Night during Adrian's freshman year, and he hopes to continue being able to watch and participate in similar events in the future that celebrate the rich racial, ethnic, and cultural heritage of his school and the entire Katy community.

14. Adrian is very close with teachers and staff in Katy ISD. Because of his passions and interests, and his autism and anxiety, he sometimes finds that he connects more with adults than people his own age, and he relies on his teachers to help foster a sense of belonging in school.

Katy ISD's Previous Policies

15. Before S.B. 12 was enacted, in August 2023, Katy ISD enacted an anti-LGBTQ+ policy that was the subject of an investigation by the U.S. Department of Education's Office for Civil Rights.³ Although that policy discriminated against LGBTQ+ students in many ways, it stated that Katy ISD was required to "respect the right of the parent to determine what is best for the welfare of their child." Pursuant to that policy, Katy ISD notified me that Adrian had requested to use his chosen name and pronouns at school. I explicitly gave approval in writing for all Katy ISD personnel to use Adrian's name and he/him pronouns in every aspect of his life at school.

16. Adrian spoke out against Katy ISD's anti-LGBTQ+ policies in August 2023 and

³ See FA (Local), Katy ISD (Aug. 28, 2023), <https://pol.tasb.org/PolicyOnline/PolicyDetails?key=594&code=FA#localTabContent>; see also Nina Banks, *Feds investigate another Texas school district for its gender identity mandate*, Texas Tribune (May 8, 2024), <https://www.texastribune.org/2024/05/08/katy-isd-lgbtq-policy-investigation/>

also spoke with his teachers and fellow students about the impact that these policies had on him and other LGBTQ+ students. Adrian especially appreciated having the Pride Club/Diversity Club as a place where he could talk about these issues with other students, and he values being able to talk about these topics with teachers as well.

Impacts of S.B. 12

17. Right before the start of this school year, one of the administrators at Adrian's school told me that the district would soon begin implementing S.B. 12, but I had no idea how severely this law would derail my child's life at school. S.B. 12 has had extremely harmful and profound impacts on my son.

18. First, the Diversity Club no longer exists at Adrian's high school. One of Adrian's friends is the president of the Diversity Club, and she told Adrian that the club was canceled due to S.B. 12. To Adrian's knowledge, other clubs like the Asian Student Union and African Student Union still exist at his school without faculty support, but the Diversity Club was seen as being too focused on LGBTQ+ issues and therefore banned by S.B. 12.

19. Second, Katy ISD has enacted new policies implementing S.B. 12 where transgender, non-binary, and gender non-conforming students are no longer permitted to use chosen names that align with their gender identity. Even though Adrian has gone by the name "Adrian" in Katy ISD for the last five years, his teachers have been explicitly instructed that they can no longer call him by this name. Although I do not interpret S.B. 12's Social Transition Ban to explicitly require teachers to stop using Adrian's affirming name, Katy ISD has interpreted it this way, which highlights the law's vagueness and has caused us immense harm.

20. Having teachers and staff refuse to use Adrian's name has made him feel incredibly dehumanized and sad. On the second day of school, Adrian told me, "It felt like I wasn't a human

being” because none of his teachers could call him by his name. I have never cried so hard in my entire life as a parent as when my son told me that his teachers made him feel like he is not a human being.

21. Adrian feels isolated and hurt by Katy ISD’s refusal to use his name due to S.B. 12, and he feels especially targeted since teachers and staff have continued using nicknames or shortened names for Adrian’s cisgender (non-transgender) peers. At first, Adrian thought his school district would ban all nicknames, but now all cisgender students at his school seem to be able to go by their chosen or shortened names.

22. Adrian’s teachers have changed the ways in which they refer to him as a result of Katy ISD’s implementation of S.B. 12. Some of Adrian’s teachers now only refer to him by his last name, whereas most others try to use no name for him at all. But being nameless at school is not an option for Adrian, and neither is using the name assigned to him at birth, since he has not gone by that name since seventh grade and having anyone use his birth name aggravates his gender dysphoria and anxiety. Adrian is the name he has used since seventh grade and is the name that I explicitly told Katy ISD to use in writing, but now the district is refusing to use it due to S.B. 12.

23. This has been especially destructive for Adrian’s relationships with his teachers. Despite having previously been so close with them, Adrian now feels like he has to walk on eggshells around them because he doesn’t want to get them in trouble. One of Adrian’s favorite teachers attempted to comply with Katy ISD’s demands that he stop using the name he has called Adrian for years, but this teacher has already given up several weeks into the school year and has started calling Adrian “Adrian” again. But Adrian is worried that if the district finds out, this teacher could be disciplined, fired, and/or reported to state officials.

24. When teachers are barred from directly addressing Adrian using his name, it creates

an exclusionary learning environment between Adrian and his peers. Before S.B. 12 was enforced against him, Adrian was an active class participant and engaged in class discussions while relying on teachers to support and facilitate group formations and discussions. When teachers do not address my child by name, it creates a barrier between not only the teacher and Adrian but also other students and Adrian. This in turn has a direct effect on Adrian's full access to his educational environment and is making him a social outcast in the classroom.

25. Adrian used to be able to talk freely with his teachers about his gender identity and social transition, as well as about topics mentioning race, ethnicity, and sexual orientation. Adrian now feels like he has to watch what he says and that his teachers are afraid to speak with him about anything remotely related to these topics, and especially anything that relates to Adrian's social transition, as that term is broadly and vaguely defined by S.B. 12. This makes Adrian feel erased and dehumanized at school while permanently harming his relationships with his teachers and peers, especially since the first few weeks of school are so formative in relationship-building.

26. I have repeatedly tried to advocate for Adrian by asserting my rights as a parent and asking that he be treated with respect and dignity at school, including by having teachers and staff call him by his chosen name. On or around August 15, 2025, I emailed the Katy ISD superintendent and board of trustees to let them know that they were violating the parental rights components of S.B. 12 and other laws by refusing to respect Adrian's name and pronouns. On or around August 19, Adrian and I both spoke with a local news program about Katy ISD's harmful implementation of S.B. 12. We then spoke at the school board meeting on August 25, and I emailed the superintendent on August 27 and again on August 30 without receiving any response. I also requested a Section 504 meeting because I believe that Katy ISD is enforcing S.B. 12 in ways that violate the accommodations it agreed to provide for Adrian's autism and anxiety.

27. Despite all of these efforts, Katy ISD has continued to enforce S.B. 12's challenged provisions against my son, including by instructing teachers and staff not to use his name or pronouns that I specifically asked them to use in writing.

28. On August 25, 2025, Katy ISD formally adopted an official board policy to implement and enforce S.B. 12.⁴ According to this resolution, "the Board of Trustees of [Katy ISD] directs all staff and contractors to comply with the following requirements and directives [among other requirements of S.B. 12]:

- Except as required by state or federal law, employees and contractors may not assign diversity, equity, and inclusion duties to any person, and the District hereby prohibits a District employee, contractor, or volunteer from engaging in diversity, equity, and inclusion duties at, for, or on behalf of the District;
- An employee or contractor who intentionally or knowingly engages in or assigns to an- other person diversity, equity, and inclusion duties or engages in prohibited instruction will be appropriately disciplined, up to and including termination; . . .
- Employees of the District are prohibited from assisting a student enrolled in the District with social transitioning, including providing any information about social transitioning or providing guidelines intended to assist a person with social transitioning; . . .
- No employee may provide or allow a third party to provide instruction, guidance, activities, or programming regarding sexual orientation or gender identity to students enrolled in prekindergarten through grade 12; . . . [and]
- No student club authorized or sponsored by the District may be based on sexual orientation or gender identity[.]

29. This official board policy and Katy ISD's related implementation of S.B. 12 cause Adrian lasting harm. He is now essentially nameless at his school, with teachers and staff refusing to call him by the name that he has been known by for the past five years. He is now more ostracized from his peers, including cisgender students who are seemingly still allowed to be called

⁴ *Resolution Regarding Senate Bill 12 and Parent Rights*, Katy Indep. Sch. Dist. (Aug. 25, 2025), <https://resources.finalsite.net/images/v1756235888/katyisdorg/jsevsdcsdfl20ei5bw5v/SB12RESOLUTION.pdf>

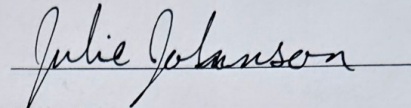
by nicknames throughout Katy ISD without repercussion. He is also no longer able to actively discuss topics of gender identity, social transitioning, sexual orientation, race, or ethnicity with his teachers for fear that they will be fired or disciplined, and he worries that he may miss out on opportunities to participate in school events celebrating the rich racial, ethnic, and cultural heritage of his school and community due to Katy ISD's implementation of S.B. 12. Because S.B. 12 is so vague, Adrian and his teachers do not even know what kinds of policies, procedures, trainings, programs, and activities are prohibited, and which are not. The Pride Club/Diversity Club that Adrian was active in for two years has also been entirely shut down due to this law, thereby silencing Adrian's speech and cutting off a safe space and refuge that he has had for the past two years to congregate with other students and be himself. Adrian seeks to be able to continue actively participating in a Pride Club/Diversity Club and engaging in all of the same types of activities, events, and conversations now prohibited by S.B. 12 if this law did not exist.

30. Moreover, Katy ISD's implementation of S.B. 12 interferes with my rights as a parent because it prohibits teachers and staff from supporting and assisting my child in the ways that I have explicitly asked them to do. I want Adrian to benefit from enriching programs and activities that reference race, ethnicity, gender identity, and sexual orientation at his school, yet S.B. 12 interferes with these programs and activities while also stopping Adrian from participating in a club that has brought him joy and happiness these past two years. This pains me as a parent because S.B. 12 is silencing the voices and views of parents and students like me and Adrian to impose on our schools a vision of what the government wants us to believe or participate in.

31. Because S.B. 12's implementation has been so incredibly harmful and threatens to impose even more harm on our family, we bring claims against the Commissioner and Katy ISD and ask that the GSA Ban, Inclusivity Ban, Social Transition Ban, and Don't Say LGBTQ+ Ban

be declared unconstitutional and enjoined.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on
September 14, 2025.


Julie Johnson