

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

CARMILLA TATEL, *et al.*,

Plaintiffs,

v.

MT. LEBANON SCHOOL DISTRICT, *et al.*,

Defendants.

Civil Action No.: 2:22-cv-00837

Hon. Joy Flowers Conti

**DECLARATION UNDER PENALTY OF PERJURY  
OF LINDSAY AND CHRISTIAN CASHMAN**

We, Lindsay Cashman (she/her) and Christian Cashman (he/him), both being of sound mind and over the age 18, hereby declare and state as follows:

1. We are a married couple living in Mt. Lebanon Township, Pennsylvania where we are raising our two children who attend preschool and elementary school in Mt. Lebanon.
2. We both grew up in Mt. Lebanon Township and attended K through 12 in the Mt. Lebanon School District, including attending Jefferson Elementary School. We graduated from high school in the early 2000s.
3. While growing up in Mt. Lebanon, the School District notably lacked visible diversity, especially related to LGBTQ+ students and staff. Very few students publicly identified as non-heterosexual or non-cisgendered, even though many students privately identified as LGTBQ+. We observed

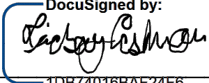
students who were perceived as gay get bullied incessantly. During our time as students in the District, we knew at least two students who were forced to leave the District because of the harassment they experienced at school. They couldn't even get through the halls without bullying. The District lacked inclusive education that was representative of gender diversity. We perceived the school environment as hostile to students who identified as or were perceived as being LGBTQ+.


4. When we decided to move back to Pittsburgh to begin raising our family, we did not want our children to experience the same hostile school environment in which we grew up. We considered not returning to our hometown or sending our children to private school. However, in researching the Mt. Lebanon School District, we found that in the years since we graduated it had worked to develop a more inclusive curriculum and was striving to create a safer and more accepting community for all students.
5. We greatly value a school environment that ensures our children and other students will be comfortable and safe expressing who they are as they grow and develop, including how they personally feel about their gender identity and expression. If our children are gender diverse, we do not want them to feel unsafe and unwelcome in their own schools.

6. Equally important is how our children will learn how to interact with other students and peers who are gender diverse. We are part of a community that encompasses the LGBTQ+ rainbow. Both of our children have friends who are transgender. We want our children to understand differences and be respectful and considerate to others. We want all children and adults to be safe and welcomed in our community and not forced out of the School District.
7. Our children have been aware of differences in gender identity and expression since they were in preschool. Children are perceptive, and gender is an unavoidable theme in our society and in our children's lives. Teaching our children acceptance of others, including of different gender identities and expressions, should begin at a young age since we've already witnessed our children grasping the gender differences among their peers and members of our community. We use books to help tell stories of inclusion as well as learning new skills.
8. At school board meetings, we've spoken out about our commitment to a safe and inclusive school environment for all students, and we have repeatedly gone to the ballot box to express our support. With all due respect, we are asking that our civil engagement be respected by this Honorable Court.

We declare under penalty of perjury that the foregoing is true and correct.

Executed on 2/9/2024, in Mt. Lebanon, Pennsylvania.

Signature:  \_\_\_\_\_ Date: 2/9/2024  
1DB74016BAF24F6...  
Lindsay Cashman

Signature:  \_\_\_\_\_ Date: 2/9/2024  
224993459270471  
Christian Cashman