

**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 ALEXIS (LEXI) BYROM**

I, Alexis (Lexi) Byrom (she/her), being of sound mind and over the age 18, hereby declare and state as follows:

1. I am a 2023 graduate of Mt Lebanon High School. I spent all my schooling in the Mt. Lebanon School District, where I attended Washington Elementary School, Mellon Middle School, and the High School.
2. Starting in my junior year of High School I transitioned into a woman. My life improved drastically.
3. At a young age I understood that my gender identity didn't fit my assigned gender at birth, but I didn't really understand what that meant. The elementary and middle schools at the time didn't offer LGBTQ-inclusive education, so I never saw any representations of gender diversity, no one

that matched how I felt. What I did learn, unfortunately, was that it wasn't good to be like me.

4. In elementary school, students commonly used homophobic slurs, like saying "that's so gay" to mean bad. By the 6th and 7th grades other students started targeting me with jokes and ridicule for their perception that I "looked" or "acted" gay. A frequent insult was to insert the word "gay" into my dead name.
5. I tried to laugh off these comments. If I got defensive, I knew it would only encourage more comments. But I would go home and wonder why I was the way I was. I would get mad at myself for being that way. Without understanding gender beyond normative gender expectations, and without seeing positive representations of gender diversity and transgender people in the places I went and the lessons I learned, I thought my only option was to shut down my feelings of being a woman. I recognize now that I was depressed throughout middle school.
6. My middle school experience did offer some hope, though. For the first time I met openly queer friends who didn't use homophobic slurs. Being with them and seeing them live openly and with pride, gave me a sense of peace with myself. But, I feared that being seen with these new friends would

make the teasing worse from the other students that I had grown up with all my life.

7. In High School life started to improve. I began to educate myself more about diverse gender representations and learned what transgender meant. I found safety in my new friends. When I finally transitioned to a woman, it felt like a great weight had been lifted off my shoulders. I finally started to see representation of gender and sexual orientation diversity in the school's curriculum, including learning about the history of the Stonewall Riots in New York City and about different gender identities in sex education class my senior year. These learning opportunities were really meaningful to me and reinforced the happiness and acceptance I felt with my personal gender identity.
8. Looking back on my education, I understand that children tease other children. I do not blame them for their comments. They were children and didn't understand how much harm their words and actions did to my wellbeing. They were never given a proper understanding of who gender diverse people are, or even that they exist in our community and schools.
9. But, I wish that my experience had been different. I wish I could have back the years I spent detached from myself, full of internalized hate. I wish the

adults in charge of the school had better educated the other children, so they had a better understanding of gender diversity and saw it as less scary.

10.If the District had offered an LGBTQ-inclusive education from an early age, I wouldn't have wasted years floating through my life. I wouldn't have hated myself as much. Children are exposed to binary gender norms at a very early age, and if they are not exposed to more gender diversity, they fix in on those gender norms as the only acceptable form of gender expression. If provided with representation and given the words to understand gender diversity, including the existence and experiences of transgender people, not only will students like me be able to understand who they are, but other students will also be able to understand and respect who we are. They won't be afraid or see us as demonic. They would see us as normal kids, just like them, rather than outsiders that they need to fear or ridicule. Then they can understand that their "lighthearted" teasing and "casual" slurs can cause serious harm.

11.Allowing other students to get up and leave class during LGBTQ-inclusive education (or to "opt out") would be so hurtful. An opt out feels like a public statement that really invalidates my existence as a human being, like it's up for debate whether other students need to respect and recognize my very existence. And, those students who opt-out would never learn how to deal

with transgender people in the real world, when they leave school, which they will have to do.

12. I'm now a freshman student at the University of Pittsburgh studying nursing.

I'm happy with myself. I finally feel like a complete person.

13. I still worry about being a transgender woman in this world—not about how

I feel internally—but about how other people will react to me. And I'm

happy knowing that current students coming up through the Mt Lebanon

School District who are like me will be able to see themselves in the

curriculum. I believe that learning about gender diverse people and seeing

their experiences reflected in the classroom will provide these students with

a safer and more welcoming school environment, and will help them learn

who they are and grow into the best versions of themselves – I know it

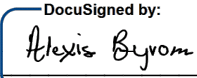
would have done so for me.

14. And when I walk into their hospital room, I'm hopeful the students will

welcome me as their nurse.

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

Executed on 2/10/2024, in Mt. Lebanon, Pennsylvania.

Signature:  Date: 2/10/2024
Alexis (Lexi) Byrom