

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

Z.J.W., by next friends and parents, TERESA
CATOE and JOHN WHEELER;

and

A.A.P., by next friend and parent, SUSAN
PARK

Plaintiffs,

v.

KING GEORGE COUNTY SCHOOL
BOARD; DR. JESSE BOYD, in his official
capacity as Superintendent of King George
County Schools; and DR. CASEY NICE, in
his official capacity as Principal of King
George Middle School,

Defendants.

Case No. 3:26-cv-00775-REP

DECLARATION OF Z.J.W.

I, Z.J.W., pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury:

1. I make this declaration of my own personal knowledge, and, if called as a witness, I could and would testify competently to the matters stated herein.
2. I am thirteen years old and live in King George County, Virginia with my mom, Teresa Catoe, and my dad, John Wheeler.
3. I attend King George Middle School ("KGMS") and am a rising eighth grader. After a hard start to middle school, I did well my seventh-grade year and made good friends at school.
4. I play clarinet in band and outside of school, I do martial arts and other sports.
5. Sometimes I feel different than my peers. I've dealt with bullying that sometimes makes it hard to be at school.

6. I learned about Gay-Straight Alliances when I was doing my own research on ways to be feel more connected to other kids. I found out that other schools had GSAs to create community and support, and I got the idea that my school could have one. I thought having that kind of club at KGMS could help me and my friends feel less alone. Lots of students, including LGBTQ+ students, at KGMS are bullied. I wanted everyone to have a place where they felt comfortable talking to each other, because not everyone has that right now.
7. I knew KGMS requires a teacher sponsor for student-led clubs, so I asked my homeroom teacher, Mr. Riley, if he would sponsor a GSA. Mr. Riley said he supported the club, but he had other commitments after school, when the club would meet, so couldn't be its sponsor. He suggested I ask another teacher, Ms. Boe.
8. When I asked Ms. Boe, she said yes and helped me start the approval process. I was so excited.
9. Whenever I got a chance, I would talk to Ms. Boe about what the GSA could do and what to include in the application paperwork. I even kept a journal where I would write down ideas for the GSA, like us doing arts and crafts together and having time for students to talk together without judgement. I gave some of my ideas to Ms. Boe in writing to help her with the paperwork.
10. Then my parents went to a King George County Schools ("KGCS") School Board meeting in September 2025. When they came home, they explained some adults were angry about KGMS potentially having a GSA. My principal, Dr. Nice, told me they were pausing the GSA's formation.

11. I was angry. I didn't understand why people thought the club is going to do bad things. The GSA is for people to connect and be together. It is to help people feel welcome at school, which not everyone does right now.
12. After the GSA's application was paused, Mr. Riley told me that Dr. Boyd, KGCS' Superintendent, said that the club could probably be approved if we changed the name to something that didn't include LGBTQ+ topics. Mr. Riley asked me and A.A.P., another student who wanted to join the GSA, what we thought about Dr. Boyd's suggestion. I did not want to change the club's name because I didn't think that was fair.
13. In November 2025, Ms. Boe explained to me that KGCS School Board changed its policy to prohibit all noncurricular clubs at the middle school. I felt so frustrated that they would cancel all clubs just to stop one club that helped some students feel safe.
14. Even after the KGCS School Board did that, I noticed the Yearbook Club kept meeting. I asked why that club wasn't canceled, and Dr. Nice told me it was curricular. But we don't have a journalism or photography class or any other class related to yearbooks.
15. I am frustrated that other clubs continue to meet and the GSA is being singled out. I followed all the rules to form a club. I think LGBTQ+ student organizations are being singled out and that if I'd proposed another type of group last fall, it would have been allowed to form. Targeting this club is bullying, discrimination, and unfair.
16. After the policy change, every time I saw Dr. Nice in the hallway after, I'd ask him to meet with me about the GSA. In or around January 2026, Dr. Nice and Dr. Boyd met with me and A.A.P. We asked them why we couldn't have the club. Dr. Boyd said that the school was worried that students talking about LGBTQ+ issues created a risk of suicide. Dr. Boyd said if

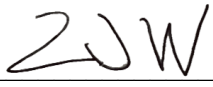
we changed the name of the club, it might be approved. He also suggested the club meet outside of school hours and away from the school.

17. Since October 2025, I have been making public comments at KGCS School Board meetings in support of having a GSA at KGMS.

18. Having a place where I feel comfortable talking and spending time with other students who won't bully or judge me would make my last year in middle school better. I've already met friends like A.A.P. through working together to create the GSA. I want that for other students, too.

Executed this 3rd day of August 2026

Respectfully submitted,



Z.J.W.