

**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 A.A.P.

I, A.A.P., 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 fourteen years old and live in King George County, Virginia. I just graduated from King George Middle School (“KGMS”) as an eighth grader in the spring of 2026 and am excited to start high school this fall at King George High School (“KGHS”).
3. Middle school was a horrible environment for me. I was bullied by other students, especially in eighth grade.
4. At the beginning of eighth grade, I saw a club flyer on the KGMS student Canvas page advertising a new Gay-Straight Alliance (“GSA”) club that was in the process of forming. I

was very excited to see this because I thought it would be so nice to have a community with other students who were accepting.

5. I filled out an interest form to join the club and spent the day talking with my friends about how excited we all were. We started brainstorming activities we could do with the club like crafts, bracelet making, painting, and other art projects.
6. The same week, I heard lots of other students commenting negatively about the club. It seemed like many students didn't want an LGBTQ+ affirming club. I heard that there were hateful posts on Facebook about the club and that people would be discussing the club at the School Board meeting that week.
7. I also found out that the school had decided to block the GSA from forming, initially temporarily.
8. I asked my mom if we could go to the meeting together and share why the club should be allowed to form at KGMS, and she said yes.
9. My mom and I attended the School Board meeting on September 22, 2025, and both of us gave statements to the School Board about the club. I told the School Board that equality hurts no one, and self-expression hurts no one, but removing a club that promotes equality and self-expression hurts many. I told the Board that banning the club says to students, "You have no place in our school." I told them how important the GSA was for students to feel seen.
10. At school following the meeting, I asked Dr. Nice to meet to talk about the club's application not being approved. My mom learned that Z.J.W., a seventh grader I hadn't met before, had proposed the club.

11. Z.J.W. and I started talking because we were both advocating for the right to have a GSA.

Knowing that Z.J.W. felt the same way I did and that we could support each other in our fight for the club was exactly why I wanted to have a GSA. It makes me sad that instead of becoming friends in the GSA and spending time doing crafts together and hanging out just for fun, we became friends because our right to form the club was denied. I want other students at KGMS to have the community and safe space I was denied.

12. I knew that both Ms. Boe and Mr. Riley were supportive of the club and continued to talk to them, especially Mr. Riley about the club being blocked.

13. On November 7, 2025, my mom told me she had spoken with Mr. Riley. He told her that he'd talked to Dr. Boyd, and Dr. Boyd had offered to let us form a different club that wasn't called a GSA. Mr. Riley told her that if we had a general club for kindness that did not mention or advertise LGBTQ+ issues, we could have the club.

14. This offer made me more upset. I knew that the school was only stopping us from having this club because it was supportive of LGBTQ+ students. Z.J.W. and I agreed we did not want a different club, we wanted a GSA.

15. Later that day, after my mom heard from Mr. Riley, I sent an email to Dr. Boyd and Dr.

Nice. I told them that KGMS needs a GSA and that I am harassed every day. I also told them that many other students at the school are harassed every day. I confided in them that other students threaten me, tell me to kill myself, and use slurs against me all the time. I also told them that the GSA was about a group of people coming together and supporting each other, and that I thought they were discriminating against us by prohibiting the club. I stated that talking about LGBTQ+ topics is not inherently inappropriate, just as talking about heterosexual topics is not.

16. Attached as Exhibit A is a true and accurate copy of my Nov. 7, 2025, email to Dr. Boyd and Principal Nice.
17. A few days later, Dr. Nice emailed me back saying he was sorry I've experienced harassment or been made to feel unsafe about school. In his response, he ignored my comments about the importance of the GSA. Dr. Boyd never replied to my email.
18. Attached as Exhibit B is a true and accurate copy of Dr. Boyd's Nov. 10, 2025, email to me.
19. I spent the year working with Z.J.W. to do everything we could to try to form the GSA.
20. The bullying became so horrible over time that one day I had to leave school to avoid the harassment. Things had been building up, and the day I left school, I just couldn't take it anymore.
21. The school environment and bullying only made me fight harder for the GSA. Even though it was hard for me to go to school every day, I knew how much the GSA would help students like me get through the day.
22. I continued going to School Board meetings with my mom and speaking to the School Board and Dr. Boyd about why the GSA matters.
23. One of the meetings I spoke at was on January 7, 2026. At the meeting, I told the School Board I value community, safety, and freedom, but those values don't align with the Board's actions. Instead of actively trying to keep students safe and respecting other people, they were doing the opposite. I told the Board that as an eighth grader I was trying to leave the school a better place. I left that meeting feeling incredibly upset and like the school did not care about students' rights or respect all students.
24. After the January 7 meeting, I emailed Dr. Boyd and Dr. Nice and asked to meet with Dr. Boyd. I told them it took all my courage to talk in front of everyone just for Dr. Boyd to twist

my words. I hated what he said about my comments. Specifically, in the School Board meeting, Dr. Boyd said that he was concerned about students talking about serious topics like mental health in a club, which I felt twisted my words and ignored the real meaning of what I had shared. In my email, I told them that they weren't listening to us and what the club would actually be: a safe community for students to be around other students and make friends. I stated that suicide is mainly caused by loneliness or self-isolation, which is caused by not having a stable community. I told them they do not take harassment and bullying very seriously and that they were bullies, too. Preventing the GSA from forming is telling students, "You don't have a place in my schools," putting a target on their backs, and leaving them to the wolves.

25. Attached as Exhibit C is a true and accurate copy of my Jan. 7, 2026, email to Dr. Boyd and Principal Nice.

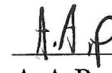
26. A week or so after I sent this email, Z.J.W. and I met with Dr. Nice and Dr. Boyd. Dr. Nice told us we should try to have our club somewhere else, like at someone's house or the library, outside of school hours. We told him this wasn't a good solution. We wanted the club to be accessible to any student who had permission and wanted to join, and that wouldn't be possible if it was off campus. Dr. Boyd told us, among other things, that he had no real power over the situation which I found hard to believe. He kept the conversation going around in circles with little room for Z.J.W. and me to speak. Ultimately, Dr. Boyd and Dr. Nice told us that we could fight all we wanted for the GSA, but a GSA just wouldn't happen. They once again repeated the offer for us to propose a non-GSA club to the School Board for approval, but Z.J.W. told them that was wrong and that we didn't want an alternate club to the GSA.

27. I think what the school is doing is wrong. During my three years in middle school, they did not treat other clubs like this. For instance, I joined the school's Book Club in the fall and that was not stopped from meeting.

28. I am sad and disappointed I never got to have a GSA while I was at KGMS. I know there is a GSA at the high school, and I plan to join it and a few other clubs when school starts in the fall. But having the GSA is still so important for KGMS students even though I'm not a student there anymore. Middle school was horrible for me. Students harassed and bullied me constantly, so I know it is essential for other students to have a GSA. I feel lucky to have the support system I have—my mom, dad, sister, and cats. But I know other students don't have the support system I do, and that is why the GSA is so important.

Executed this 3rd day of August 2026

Respectfully submitted,


A.A.P.