

Jessica A. Skelton, OSB No. 102714
jessica.skelton@pacificallawgroup.com
Gregory J. Wong, *Admitted Pro Hac Vice*
greg.wong@pacificallawgroup.com
Alanna Peterson, *Admitted Pro Hac Vice*
alanna.peterson@pacificallawgroup.com
PACIFICA LAW GROUP LLP
1191 2nd Ave, Suite 2000, Seattle, WA 98101
Telephone: 206-245-1700

Jeffrey B. Dubner, *Admitted Pro Hac Vice*
jdubner@democracyforward.org
Josephine T. Morse, *Admitted Pro Hac Vice*
jmorse@democracyforward.org
Javier M. Guzman, *Admitted Pro Hac Vice*
jguzman@democracyforward.org
DEMOCRACY FORWARD FOUNDATION
1333 H Street NW, Washington, DC 20005
Telephone: 202-701-1773

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

MULTNOMAH COUNTY, an existing
county government and a body politic and
corporate,

Plaintiff,

v.

ALEX M. AZAR II, in his official capacity
as Secretary, U.S. Department of Health and
Human Services; VALERIE HUBER, in her
official capacity as the Senior Policy Advisor
for the Office of the Assistant Secretary of
Health and the Acting Deputy Assistant
Secretary for the Office of Population
Affairs; and U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES

Case No. 18-cv-01015-HZ

DECLARATION OF
VERONICA S. LEONARD

In Support of Plaintiff's Motion for
Preliminary Injunction and Partial
Summary Judgment

Defendants.

DECLARATION OF VERONICA S. LEONARD

I, Veronica S. Leonard, declare as follows:

1. I am the Health and Wellness Manager at Latino Network, where I have worked since 2015. I have a Master of Science in Public Health and a Masters in Social Work from the University of North Carolina at Chapel Hill and have devoted my professional career to working in the field of youth sexual education with a particular focus on the Latino community and evidence-based sex education programs. I also serve as Latino Network’s Interim Director of School Based Programs, and, as of July 1, will be the Director of School Based Programs. I presently oversee Latino Network’s participation in Multnomah County’s Adolescents & Communities Together (“ACT”) program through a \$120,000.00 annual grant subaward as part of the federal Teen Pregnancy Prevention Program.

2. Latino Network is a Latino-led non-profit organization committed to educating and empowering Latinos in Multnomah County. Our work is centered on the core value of Latino self-determination—that is, the ability of community members to participate meaningfully in the decisions that affect their lives. Latino Network runs programs that help improve community livability, foster civic participation, and prepare for educational and life success, including in the area of youth sexual health education, which is critical given the comparatively high rates of unplanned teen pregnancies and sexually transmitted infections among Latino youth. Consistent with Latino Network’s focus on self-determination, we believe in providing our youth with comprehensive sexual education that is unbiased,

medically accurate, culturally inclusive, and evidence-based so that our teens have access to information to make informed decisions about their bodies and sexual health.

3. Latino Network has been a community partner with Multnomah County in the ACT program since 2015. In this role, we have been teaching a culturally-specific version of an evidence-based comprehensive sexual education program in after-school programs in 19 middle and high schools across the County. We selected this program, in consultation with other ACT partners, from the list published by the U.S. Department of Health and Human Services' Office of Adolescent Health, in part, because it had previously been evaluated and shown positive results. Latino Network programs seldom tackle isolated problems—such as sexual risk behaviors—but focus instead on providing holistic support and opportunities for young people. For example, in addition to teaching this evidence-based programming to youth in after-school programs, the ACT program also has funded sexual education in our parent after-school programs, providing parents with similar information to what we have been teaching youth in order to provide them with information many have never received themselves, reaching over 250 parents in the process.

4. The evidence-based youth sexuality program we have taught through the ACT program has shown clear, positive impacts on knowledge levels, with youth showing gains in how to prevent both transmission of sexually transmitted infections and pregnancy, and in where to access services for sexual and reproductive health. Youth also report increased comfort in discussing sexual health issues with a trusted adult or partner. One youth told us, “I learned how to say no when I don’t want to have sex with someone else.”

5. There are multiple aspects of the new Tier 1 Funding Opportunity Announcement (“FOA”) that I understand to prioritize abstinence-only “sexual risk

avoidance” messages that conflict with Latino Network’s core belief in self-determination, our approach to comprehensive sexual education, and the evidence-based program that we are teaching. For example, we do not believe in emphasizing “cessation support,” which requires a primary focus on convincing sexually active youth to become abstinent, because we do not want to send a shaming or stigmatizing message that teens must stop having sex. Rather, we believe and teach that sex is a normal and healthy part of human development and that our youth must receive comprehensive information to make the best and safest choices regarding sexual activities. At Latino Network, we recognize that there may be a range of values around this subject in our community, however it is not our job to teach those values, rather our role is to provide comprehensive and medically accurate information to youth and parents which they can then review from their own values framework. The FOA also requires applicants to “communicate that teen sex is a risk,” like riding without a seatbelt, that has multiple negative consequences, another message that is shameful, stigmatizing, and inconsistent with Latino Network’s beliefs and mission. Based on my experience as a public health specialist and working with Latino communities and youth in Multnomah County, I believe that these abstinence-only messages tend to produce suboptimal health outcomes by not giving our youth the information they need to be healthy and make safe choices regarding sexual activity.

6. We were notified by the County in the first week of July 2017 that our subaward as part of the ACT program would be cancelled on June 30, 2018 after the County’s grant was terminated. If we do not continue to receive funding under the ACT program, we risk having to terminate one staff member, a trainer of other health educators who has trained over 50 educators within Latino Network and the other ACT partner

organizations. We would also have to stop teaching the evidence-based sexual education program to our middle and high school groups and reduce the amount of work we are carrying out with parents, both of which would negatively impact our ability to continue to support equitable access to comprehensive sexual health education for the Latino community in Multnomah County.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 20, 2018 in Portland, Oregon.


Veronica S. Leonard