DECLARATION OF LIDIJA GEEST

COMES NOW, Lidija Geest and pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

1. My name is Lidija Geest, I reside in Davenport, Iowa and I am over 18 years old. I have personal knowledge of the facts as stated herein.
2. I am the mother of K.G. who is six years old and attends first grade at Adams Elementary in the Davenport Community Schools District.
3. Because my child is under the age of twelve, he is not eligible to receive any of the currently authorized COVID-19 vaccines.
4. K.G. has asthma, which the CDC has identified as a risk factors for severe illness with COVID-19.
5. K.G. has a PRN letter with the school for his inhaler. (See Attached Exhibit A). At times the school nurse must administer the inhaler; however, I have knowledge that she does not wear a mask. I requested that she be masked when administrating the inhaler, because K.G. cannot be. This request was denied.
6. His doctor has informed me that my child is at risk for severe complications if he contracts a COVID-19 infection. According to his doctor, to decrease his risk, he, and everyone around him should observe strict COVID-19 safety protocols and wear a mask indoors. (See Attached Exhibit B).
7. This year Davenport is offering a remote learning option through a third-party provider, Edgenuity. This online program is pre-recorded and self-taught, and does not provide the necessary supports, services and accommodations, including live teacher instruction. I do

not believe this option provides sufficient support, or the necessary accommodations for my child.

8. Last year K.G was remote, but his mental health suffered greatly, and this fall we have made the difficult decision to send him back in person. I am in the horrible position of deciding between my child's physical safety and mental health.
9. Prior to the start of the school year, we sought an accommodation through the teacher to have her wear a mask when at least she was working with K.G. on a one-on-one basis.
10. After his first week in person, I am even more concerned for K.G.'s health at school. He has informed me that his teacher is not wearing a mask when interacting with him one-on-one. Very few students are wearing masks in school. Furthermore, in gym class the instructor even made K.G. take off his mask to run indoors.
11. I believe that if everyone was wearing a mask and the school was following the guidance and recommendations from the CDC, my child would be safe in school.
12. I am seeking to have HF847 blocked so that my school will be able to require universal masking as necessary to meet its obligations to my child.

I swear under the penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 2 day of September 2021, at Davenport, Iowa.

Lidija Geest, Plaintiff