

AMBIKA KUMAR\*  
ambikakumar@dwt.com  
DAVIS WRIGHT TREMAINE LLP  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104  
Telephone: (206) 622-3150

ADAM S. SIEFF\*  
adamsieff@dwt.com  
DAVIS WRIGHT TREMAINE LLP  
865 South Figueroa Street, 24th Floor  
Los Angeles, CA 90017  
Telephone: (213) 633-6800

DAVID M. GOSSETT\*  
davidgossett@dwt.com  
CHELSEA T. KELLY\*  
chelseakelly@dwt.com  
DAVIS WRIGHT TREMAINE LLP  
1301 K Street NW, Suite 500 East  
Washington, DC 20005  
Telephone: (202) 973-4200

ROBERT CORN-REVERE\*  
bob.corn-revere@thefire.org  
FOUNDATION FOR INDIVIDUAL  
RIGHTS AND EXPRESSION  
700 Pennsylvania Avenue SE, Suite 340  
Washington, DC 20003  
Telephone: (215) 717-3473 Ext. 209

DAVID RUBIN\*  
David.Rubin@thefire.org  
FOUNDATION FOR INDIVIDUAL  
RIGHTS AND EXPRESSION  
700 Pennsylvania Avenue SE, Suite 340  
Washington, DC 20003  
(215) 717-3473 Ext. 283

JEROME H. MOONEY (Utah Bar #2303)  
jerrym@mooneylaw.com  
WESTON, GARROU & MOONEY  
50 West Broadway, Suite 300  
Salt Lake City, UT 84101  
Telephone: (310) 442-0072

*Attorneys for Plaintiffs*  
*\*Admitted Pro hac vice*

---

UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

---

HANNAH PAISLEY ZOULEK, a Utah resident; JESSICA CHRISTENSEN, a Utah resident; LU ANN COOPER, a Utah resident; M.C., a Utah resident, by and through her parent, LU ANN COOPER; VAL SNOW, a Utah resident; and UTAH YOUTH ENVIRONMENTAL SOLUTIONS, a Utah association,

Plaintiffs,

v.

KATIE HASS, in her official capacity as Director of the Utah Dept of Commerce Division of Consumer Protection; SEAN REYES, in his official capacity as Utah Attorney General,

Defendants.

---

**DECLARATION OF VAL SNOW IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Case No. 2:24-cv-00031-DAK-DAO

Judge Dale A. Kimball

Magistrate Judge Daphne A. Oberg

I, Val Snow, declare as follows:

1. I live in Midvale, Utah, and work as a repair technician, focusing on injection molding.

2. I grew up in a community called the “Order” where I did not have consistent access to the internet or social networks until the age of 18. My family pulled me out of school at the age of 14 and forced me to work instead of obtaining an education.

3. During my childhood, I was deprived of accurate information regarding sexual orientation or safe sexual experiences—which left me feeling confused and isolated regarding my own gay identity. Instead, I was taught that being gay was evil and that all gay men will die of AIDS.

4. This lack of knowledge became even more harmful when I experienced a sexual assault at a young age and did not have the language or information necessary to report it.

5. Social networks have played a significant role in my life by helping me learn much of the information, perspectives, and life skills that I was deprived of as a child. Through Facebook and MySpace, I was able to connect with other LGBTQ individuals and hear about their experiences—learning that I was not alone or evil. Through YouTube, I was able to watch videos that taught me about self-help and healthy relationships. And Reddit helped me learn a wide variety of life skills.

6. Facebook also helped me to find a job, as I saw a post regarding a vocational rehabilitation service, which I used to connect with Job Corp and acquire a trade certification for culinary arts. This certification allowed me to work in hotel catering and make a living for myself.

7. This past year, I started my own YouTube channel, where I cover topics such as mental health, positivity, resilience, creativity, and LGBTQ perspectives. Both teens and adults watch my channel and have reached out to me to engage in community or seek support. I created

this channel in part to reach teens and adults from my former community and provide them with some of the information and perspective that I never had while growing up. I also derive a great sense of personal satisfaction from creating content on YouTube—it has helped increase my confidence and allowed me to open up to others.

8. I find it very concerning that the Utah Minor Protection in Social Media Act (the “Act”) would force me to disclose sensitive age-verification data to major technology companies, in order to fully access social networks. I worry about my data privacy and the potential for identity theft, not to mention the fact that the Utah government has no right to force me to disclose such data in order to exercise my free speech. Accordingly, if the Act takes effect in October, I do not intend to disclose my sensitive personal data—meaning that, even though I am over the age of 18, I will be subject to the same limitations and restrictions as Utah minors under the Act.

9. These restrictions mean that no one will be able to see my YouTube videos except for my YouTube followers. This upsets me because I create my videos in part to inspire at-risk and marginalized youths still trapped in the Order, who may not want to publicly follow me out of fear that they will be accused of trying to leave the community. I know that at least one Order leader has monitored my YouTube channel to see if I am saying anything about the community, and so he and other leaders would also be able to see if current members of the group followed my account. It additionally concerns me that, more generally, other people who might find my content helpful, positive, or inspiring will not be able to discover it. I also sell some products through YouTube and Facebook, and will be unable to reach new customers under the Act.

10. I also believe the Act will have damaging consequences on young people growing up in isolated homes like I did. Because of the Act, teens in the Order and other at-risk youths will not be able to reach out for help or resources via direct-message (as I once did) without publicly

following such accounts. Additionally, teens and even young adults in the community where I grew up sometimes are denied access to personal ID cards—thus, they will likely be unable to comply with the law’s age-verification requirement. When I was still in the Order, for example, I did not have access to my social security card. Even if they have access to ID cards, many people in this sheltered community will likely feel uncomfortable sharing such personal information with large technology companies, and may choose to refrain from social network use instead of doing so. And because social network use is generally discouraged in the Order, parents will be unlikely to allow their minor-children to override the most restrictive portions of the Act.

11. This law will further isolate and marginalize these individuals who already live in a highly controlled environment, making them additionally vulnerable to abuse. It also concerns me that I will not be able to view these individuals’ social network content to see if they are crying out for help.

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

Signed in Midvale, Utah this 30th day of May, 2024.

A handwritten signature in cursive script that reads "Val Snow". The signature is written in black ink and is positioned above a horizontal line.

Val Snow