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UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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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; and 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.

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**DECLARATION OF HANNAH PAISLEY ZOULEK 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

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I, Hannah Paisley Zoulek, declare as follows:

1. I am an 18-year-old living in Millcreek, Utah. I recently graduated from high school and will be attending college in the fall.

2. While in high school, I was Editor in Chief of my school's literary magazine, Captain of the robotics team, and President of the speech and debate team. In college, I intend to study rhetoric and psychology.

3. Social networks have played a significant role in my life. As an autistic, physically disabled, and queer teenager growing up in Utah, I struggled to meet other people like me and to hear from people with similar perspectives. I found that many people viewed my autism as a problem to be fixed as opposed to understanding the nuances and benefits of seeing the world through a different lens. Similarly, I experienced a lot of anti-queer sentiment in my community and struggled to find physical spaces where I felt that my identity was accepted.

4. This isolation led me to feel anxious and depressed. But fortunately, I was able to find communities of people like me online, which made me realize I was not alone and helped me learn more about myself and how to navigate the world. In particular, the social network forum Tumblr helped me to connect with disabled and queer communities, as well as other groups. And fan fiction websites gave me access to stories with LGBTQ characters that normalized my experiences and emotions and allowed me the ability to express myself by sharing my own creative writing. Additionally, reading about and relating to the experiences of neurodivergent individuals on Tumblr prompted me to seek out further information from my doctor about autism and ultimately receive a diagnosis.

5. When I was about 13, I created my first account on the fan fiction platform fanfiction.net. I first established my Tumblr account and an account on the fan fiction platform

Archive of Our Own (AO3) when I was about 15 years old. My mother was aware and supportive of these choices.

6. In addition to enabling and fostering my communities and connections, I have also used Tumblr to learn about different perspectives on current events. For example, I consulted Tumblr shortly after the U.S. Supreme Court reversed the *Roe v. Wade* decision to better understand the impact of the ruling. Sometimes I will hear about a news story on Tumblr and then read about it further elsewhere online. Oftentimes, after I read a particular story or access particular material on social networks, I will find helpful suggested links or recommended content related to what I was viewing.

7. I have also used social networks for educational purposes. Specifically, my high school robotics club liked to use Discord, an instant messaging social platform, to communicate and organize ourselves for meetings and competitions. Additionally, I have searched for and watched recommended videos on YouTube to help me better understand certain concepts I learned in school—such as a particularly challenging mathematical calculation. I intend to continue using social networks to supplement my educational experience in college.

8. I also use community messaging websites such as Reddit for a variety of purposes. For example, because I sometimes use a cane for balance, I consulted Reddit before a family trip to Disneyland to read other people's accounts of the disability access options at the park, so that I could be prepared. I also consulted Reddit to learn about disability access on the campuses of colleges that I was considering attending, as well as LGBTQ-friendly spaces in the cities where those colleges are located. I have also used a community messaging website called Chief Delphi, which is specifically designed for competitive robotics teams like my high school team. My

teammates and I used Chief Delphi to learn about updates to robotics competition rules and to troubleshoot a strange technical issue with one of our robots.

9. About two years ago, I joined the Utah Attorney General’s Youth Advisory Committee to get more involved in my community. The Attorney General’s Office informed a subset of our committee about the idea for the proposed legislation that later became the 2023 Utah Social Media Regulation Act (“Social Media Act”) and asked for our opinions. By the end of the meeting, none of the youth committee members in this subset seemed to support the idea—and some, including me, found it deeply concerning.

10. When the Attorney General’s Office asked if any of our committee members would be willing to testify in favor of the bill, we all declined. Instead, I decided to testify in opposition to the bill. On February 3, 2023, I spoke before the Utah Legislature regarding my concerns that the Social Media Act would violate my constitutional rights and those of my peers, and would have a detrimental effect on teens’ mental health by removing a critical tool for teens to speak about mental health and seek resources.

11. As a resident of the state of Utah, the Act—if allowed to take effect in October—will directly affect me and my peers. It will require me and my mother to disclose highly sensitive personal data to major technology companies just to fully access the platforms that have been critical to my development, sense of community, and identity.

12. I do not intend to disclose this highly sensitive personal data if the Act takes effect, partly because I value the anonymity that social networks afford me to fully express myself, especially as a member of the LGBTQ community, and partly because I do not want to risk the chance that my data could be compromised. Thus, even though I am now over the age of 18, I will be subject to the same limitations and restrictions as Utah minors under the Act. This means

that, if I post any content on social networks, no one will be able to see it except individuals with whom I am already connected. This limitation would destroy my ability to share my thoughts and ideas with the world. It would be particularly devastating for my creative writing and art, as I thrive off of the feedback, ideas, commentary, and inspiration of the public—most of whom would no longer be able to access my work. I also enjoy promoting the art and writing of my friends, but there would not be much point if only a small group of people could see it. Under the Act, I would even have been prevented from sharing my own testimony before the Utah Legislature on social networks to anyone other than my current connections.

13. This restriction would also prevent me from viewing content posted on social networks by any Utah minors or non-age-verified individuals to whom I'm not connected, which would prevent me from discovering or connecting with other Utah teenagers online. I would therefore be prevented from, for example, promoting a local Utah community event—such as a protest or opportunity for queer youth to gather—to these teenagers. This restriction would especially affect my experience on Tumblr, where the interface involves scrolling through and reacting to (such as “tagging” or “reblogging”) the content of largely non-connected accounts. Under the Act, not only would I be unable to see any content created by Utah minors or non-age-verified accounts, I would also be unable to react to or comment on any posts by non-connected accounts—as those account-holders could not see my reactions or comments. Similarly, if I wanted to ask a question or post a comment on a Reddit thread, the other participants on the thread would be unable to see my question or comment if we were not connected on the platform (as is often the case). This would dramatically limit my ability to seek out personalized and specific information about things like disability access in particular areas.

14. Even if I met another Utah teenager in real life and wanted to “friend” or “follow” them on social networks, this person would not show up in my search results, because under the Act, social network companies are required to “restrict the visibility of a Utah minor account holder’s account to only connected accounts.” Section 13-71-202(1)(a). Tumblr does not even allow users to search for other users by their real name—the main way to find other individuals is by interacting with their content, which would be blocked under the Act. This rule would significantly impede my ability to make and deepen friendships with other Utah teenagers.

15. The Act’s prohibition on direct-messaging individuals with non-connected accounts would also negatively affect my experience on applications such as Discord and GroupMe. While, in my experience, Discord can be useful for school groups and school teachers/administrators to coordinate projects, assignments, and events, I might not want to “friend” or “follow” everyone in such a group (and thus potentially share personal information) in order to simply receive the information necessary for the school project. Likewise, even the Utah Attorney General’s Youth Advisory Committee used GroupMe—but under the Act, this platform would be rendered useless.

16. Additionally, the Act’s prohibition on social network features like continuous scrolling, autoplay, and pagination would eviscerate the platform that I use the most, Tumblr—which has been an invaluable source for my self-discovery, confidence, creativity, and hope. And the Act’s prohibition on push notifications would prevent me from receiving time-sensitive updates, such as announcements from school groups on Discord or GroupMe. I think it is particularly problematic that these provisions of the Act are impossible to override, even with parental consent.

17. Because I am now over 18, the parental supervision provision of the Act no longer applies to me. However, there are many queer teenagers in Utah, including some of my friends, who do not have parental support. Requiring them to seek parental permission to fully access social networks could cut them off from potentially lifesaving communities entirely. For example, I have a queer teenage friend in Utah who was terrified of her parents' reaction to her coming out and was also struggling with depression and suicidal ideation. Because her parents monitored her text messages, social network applications such as Discord provided the only forums for this friend to receive support and share experiences.

18. This law would have a devastating effect on teens' mental health in Utah. Being able to talk about mental health using social networks is important. If teens are unable to direct-message support groups or non-profits for help and resources without publicly following or friending them first, they will be much less likely to reach out. These same teens may also be less likely to find such groups in the first place because of the Act's prohibition on search engine indexing. Indeed, recommended groups, content, and creators from social networks have helped me find community and information that I have used to understand my feelings and get help.

19. One of my teenage friends who struggled with self-harm informed me that, without the anonymity of social networks, she might not have told anyone about her struggles. Through her anonymous posts on social networks, she was able to connect with others and receive far more personalized and practical advice than she was able to obtain through a basic Internet search. These kinds of conversations would not have been possible without the direct messaging that the Act prohibits. In a state like Utah, where it is already challenging for teens to access mental health resources, removing full access to a primary tool like social networks that they can use for information and connection would have many negative consequences.

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

Signed in Millcreek, Utah this 29th day of May, 2024.

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

**Hannah Paisley Zoulek**