

The Honorable Ricardo S. Martinez

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

WASHINGTON STATE ASSOCIATION OF HEAD  
START AND EARLY CHILDHOOD ASSISTANCE AND  
EDUCATION PROGRAM, ILLINOIS HEAD START  
ASSOCIATION, PENNSYLVANIA HEAD START  
ASSOCIATION, WISCONSIN HEAD START  
ASSOCIATION, FAMILY FORWARD OREGON, and  
PARENT VOICES OAKLAND,

*Plaintiffs,*

v.

ROBERT F. KENNEDY, JR., in his official capacity as  
Secretary of Health and Human Services; U.S.  
DEPARTMENT OF HEALTH AND HUMAN SERVICES;  
ANDREW GRADISON, in his official capacity as Acting  
Assistant Secretary of the Administration for Children and  
Families; ADMINISTRATION FOR CHILDREN AND  
FAMILIES; OFFICE OF HEAD START; and TALA  
HOOBAN, in her official capacity as Acting Director of  
the Office of Head Start,

*Defendants.*

Case No. 2:25-cv-00781-RSM

**DECLARATION OF  
FAMILY FORWARD  
OREGON MEMBER A IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR A  
PRELIMINARY  
INJUNCTION**

NOTE ON MOTION  
CALENDAR:

JUNE 13, 2025

1 I, Member A, hereby declare and state as follows:

2 1. I am over eighteen years old, and I have personal knowledge of the facts set  
3 forth in this Declaration. I could and would testify competently to those facts if called to be a  
4 witness in this case.

5 2. I am a parent member of Family Forward Oregon, a non-profit organization that  
6 organizes and empowers Oregon mothers and caregivers to fight for racial, gender, and  
7 economic justice, including access to affordable and quality childcare for all Oregon families.

8 3. I am a resident of Portland, Oregon, and a mother of three children between the  
9 ages of three and six.

10 4. My three-year-old daughter is currently enrolled in a Head Start program in  
11 Oregon.

12 5. When I first moved to Oregon about two years ago, I couldn't afford childcare  
13 here because the cost of living was so high. I was relieved when I was finally able to get my  
14 daughter placed in Head Start.

15 6. Head Start has given my daughter the ability to develop her self-identity and  
16 confidence. She now has a stronger sense of independence and is more eager to take on tasks  
17 on her own. Now, when I ask her if she needs help with a big task, she says, "I've got this!"

18 7. Since joining Head Start, my daughter has been able to develop her skills to  
19 advocate for herself amongst her peers and adults in her life. She is able to experience what  
20 it's like to be around different personalities of other kids and adults, and learn to build  
21 resiliency and adaptability in different settings. Because of Head Start, she has learned to stand  
22 up for herself, to communicate what she needs to the people around her, and to better handle  
23 conflict with other kids.

24 8. My daughter also has developed her fine and gross motor skills in ways that  
25 working parents can't feasibly help with. For example, she has access to Head Start care  
26 providers who do things with her that help build those skills, such as making slime, playing  
27

1 with sand, building letters and numbers with macaroni noodles, creating art, and other  
2 activities.

3 9. In Head Start, my daughter gets to be more creative and exploratory because  
4 she has care providers who have the skills, training, time, and patience to do those activities  
5 with her. Working parents don't have that luxury, because they are so focused on keeping their  
6 families financially stable and sound.

7 10. Because of Head Start, my daughter is even learning a new language. My  
8 daughter is in a bilingual early education environment, and she has been learning Spanish and  
9 picking up on it really fast. She loves learning Spanish. She understands her teachers when  
10 they give directions in Spanish and often helps other kids by translating for them.

11 11. Access to Head Start has also encouraged my daughter to try new healthy foods  
12 that she wouldn't normally try at home, including broccoli and other vegetables. Seeing her  
13 Head Start classmates try new foods makes her more interested in trying them too.

14 12. Head Start has given my daughter the chance to explore her gifts, and she is  
15 now advanced for her age in many ways. When we meet new people, they don't believe that  
16 my daughter is really only three years old because she is so smart and able to relate to the world  
17 in ways beyond her years. It makes me smile every time.

18 13. I tip my hat to the early educators in her life, because they all have played a  
19 very big role in her development. I know all of her gifts didn't come from just me. They all  
20 helped.

21 14. Access to Head Start also means that I am able to work and have a full-time job  
22 and career. It also means that I have time to be able to go grocery shopping, go to the gym, and  
23 take care of myself and my family in ways that I wouldn't be able to do if I didn't have  
24 childcare.

25 15. Without my children being able to get into Head Start, I don't think my family  
26 would have been able to survive out here. Without having access to Head Start, the cost of  
27 childcare alone for one child was my whole paycheck. I wouldn't have enough money to cover

1 our family's cost of living, such as rent, food, utilities, and other bills. Knowing how hard it  
2 was for me as a single mother with one income, it was impossible for me to imagine how  
3 anyone else could afford it, even if they had two incomes.

4 16. Losing access to Head Start, and especially the bilingual classroom  
5 environment, would be devastating for my daughter. She has loved learning Spanish and  
6 speaking to her teachers and classmates in Spanish. If the program or its bilingual education  
7 services were eliminated, it would disrupt my daughter's learning and emotional wellbeing.

8 17. Losing Head Start would destroy families – especially families like mine.  
9 Without Head Start, I would not have had the ability to sustain a permanent place or grow  
10 within my career. I would not have been able to take care of my family as a single mom with  
11 three kids. Head Start is a lifeline for families like mine.

12 18. For families who rely on Head Start, it will be impossible to survive without it.  
13 It is so hard to find childcare, because the facilities in my area too expensive or already have  
14 waitlists.

15 19. I am submitting this declaration anonymously, because I fear retaliation from  
16 the current presidential administration, as well as harassment and threats from members of the  
17 public, for challenging the policies and practices of the Trump administration related to the  
18 Anti-DEI and Anti-Immigration Executive Orders.

19 I declare under penalty of perjury that the foregoing is true and correct.  
20

21 Dated: May 15, 2025

22 [REDACTED]  
23 [REDACTED]