

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
DESIREE GUERRA IN
SUPPORT OF PLAINTIFFS'
MOTION FOR A
PRELIMINARY
INJUNCTION**

NOTE ON MOTION
CALENDAR:

JUNE 13, 2025

1 I, Desiree Guerra, 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.

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

9 3. I am a resident of Salem, Oregon, and the mother of two children, ages two and
10 three.

11 4. My two-year-old son is currently enrolled in an Early Head Start program in
12 Oregon.

13 5. My three-year-old daughter has aged out of the Early Head Start program and
14 is waiting to attend Head Start in September of 2025.

15 6. My family is low-income and cannot afford childcare programs where we live.
16 We depend on the Head Start program to give our children the strong and healthy start that
17 they deserve.

18 7. Head Start has been a critical part of our lives. It provides my two young
19 children with early education, healthy meals and snacks, social skills, and a safe and structured
20 environment. It gives them the opportunity to grow, learn, and be cared for in ways that I
21 simply couldn't do on my own while managing all of my responsibilities.

22 8. Since joining Head Start, my son has been able to develop his skills. My son's
23 teachers brag to me that he is ahead of his class in his speech and motor skills. He has become
24 more assertive, confident, and outgoing since starting the Head Start program. He also has
25 developed empathy and understanding when someone is hurt. He stands up for other kids in
26 his class when kids are picking on them. He also loves to help more around the house, and he
27 is even excited for potty training.

1 9. Access to Head Start has also helped to encourage my son to try new healthy
2 foods. My son can try a variety of healthy food that he does not have access to at home due to
3 our financial situation, and I fear that if we lose access to Head Start, my son will not have
4 access to the same healthy snacks and meals that he does now. I do not think we can afford to
5 spend more on groceries, as we already struggle with money at the end of every month.

6 10. My daughter was enrolled in the same Early Head Start program for a shorter
7 amount of time, due to her age. While enrolled in Early Head Start, she looked forward to
8 going each week. She became more outgoing and confident while she was enrolled in the
9 program, and also had social development with other kids her age. Her speech improved, and
10 she made new friends.

11 11. My daughter can't wait to start the Head Start program this September. She asks
12 me every day since she aged out of the program, "Mommy, when I go to school?" She tells
13 me, "Mommy, I want to go to school." She will cry about her brother being able to go to school
14 and how she cannot at this moment. I fear that if we lose access to Head Start, my daughter
15 will be devastated, as she would not be able to go back to school for another three years.

16 12. I am especially worried about the current presidential administration's attacks
17 on diversity, equity, inclusion, and accessibility ("DEIA") in Head Start. My children are
18 mixed-race, and proudly Black, Chilean, and white. They benefit from Head Start's DEIA
19 programs. It is important that my children are in an environment where they learn about and
20 are taught to celebrate their Black and Hispanic heritage and identity. It is important that they
21 are surrounded by diverse staff and classmates.

22 13. Access to Head Start means that I am able to attend college as a full-time
23 student, where I am studying social work. I chose to become a social worker because I want to
24 help other families like mine and be part of the change I believe in. I wouldn't be able to do
25 that without the support that the Head Start program provides.

1 14. Without Head Start, I wouldn't be able to attend my classes or complete
2 assignments with the focus and time that I need. Knowing my children are safe and learning
3 gives me the peace of mind to keep pushing forward in school.

4 15. I have also benefited from Head Start's parenting classes, and those classes
5 helped me a lot. The parenting classes that I was apart of taught me about the circle of security,
6 which is about strengthening parent-child relationships. The classes helped me to better
7 understand the needs of children, and helped me to reparent myself as well.

8 16. Losing Head Start would be a blow to my family and other families like mine
9 who are working hard every single day to build a better life. Losing Head Start threatens not
10 only my children's development, but also my ability to finish school and eventually give back
11 to my community.

12 17. My family is not asking for handouts—we're asking for a fair shot. Head Start
13 helps families rise. It gives kids a chance to succeed and parents the support they need to keep
14 going.

15 18. These attacks on Head Start send the message that our children's futures don't
16 matter. But they do. And I won't stop speaking up until they're heard.

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

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19 Dated: May 15, 2025

/s/ Desiree Guerra

20 Desiree Guerra
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