

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

KATHRYN HART *et al.*,

Plaintiffs,

v.

WILLIE EDWARD TAYLOR CARVER, JR.,

Defendant.

Case No. 1:23-cv-03499

Judge Julie R. Rubin

DECLARATION OF WILLIE EDWARD TAYLOR CARVER, JR.

I, Willie Edward Taylor Carver, Jr., declare as follows:

1. I respectfully submit this Declaration in support of my Motion to Dismiss for Lack of Personal Jurisdiction and Failure to State a Claim. I have personal knowledge of the facts herein and would be competent to testify to them.

2. I live and work in Kentucky, and have done so since returning to the state in 2013 after teaching for a year in Vermont.

3. I was a classroom teacher in Kentucky from 2013 through 2022, and was the 2022 Kentucky Teacher of the Year. I am openly gay and left teaching due to the discrimination that I faced in the school system, including ultimately being publicly accused of “grooming” children simply because I advised a student-run LGBTQ+ group, “Open Light.”

4. I now work at the University of Kentucky, where I am finishing a Masters in Fine Arts at the University of Kentucky. I am also an author and have published poetry. My recent book, *Gay Poems for Red States*, a memoir in narrative poetry, was published by the University

Press of Kentucky. Among other awards, it has been named Stonewall Award Winner, a 2024 Rainbow Award Book, and a Book Riot Best Book of 2023.

5. I have never lived in Maryland.
6. I have never owned real estate in Maryland.
7. I have never paid income taxes in Maryland.
8. I do not have any bank accounts in Maryland.
9. I have never been employed by a Maryland business.
10. I have never employed a Maryland resident.
11. I have never registered to vote in Maryland.
12. Although I have driven through Maryland, and stayed at a hotel in Maryland on occasion, I do not regularly visit Maryland or regularly conduct business in Maryland.
13. I am active on the X social media platform (formerly Twitter). I understand that the claims against me in this matter arise out of a single Tweet, which responded to a comment by one of the plaintiffs. Attached as Exhibit A is a true and correct copy of the full exchange.
14. I was in Kentucky at the time of that exchange, on December 21, 2023.
15. When I saw the message from “Kit Hart, American Girl,” I looked at her X profile and saw that she was a chapter chair of the Moms for Liberty group. Based on news reports, I am familiar with that group and its recent controversies.
16. After I was served a copy of the Complaint in this case in Kentucky, I “locked” my Tweet that is the subject of the claims in this case, so that it is no longer visible to the public. As of today, a total of 134 people in the entire world had viewed the Tweet, according to analytics on the X platform. Only 14 of those people “engaged” with it, which means they were interested enough to see the entire chain and replies.

17. Attached as Exhibit B is a true and correct copy of selected Tweets by “Kit Hart, American Girl,” that I identified that labeled LGBTQ+ individuals and supporters as “groomers” or similar terms.

I hereby affirm, pursuant to 28 U.S.C. § 1746 and under the penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on: Feb. 12, 2024

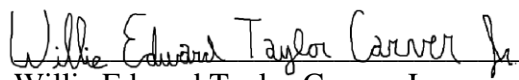

Willie Edward Taylor Carver, Jr.

Exhibit A



Willie Edward Taylor Carver Jr.

@WillieETCarver



The party of limited government and personal freedom just banned 673 books from one school district.

Republicanism is fascism.



From orlandosentinel.com

10:40 PM · Dec 20, 2023 · 6,946 Views



Kic Hart, American Girl



@5sweetharts_

How many classics has the “party of inclusion and acceptance” banned?? I’m willing to bet your schools don’t have Aesop Fables, The Book of Virtues or O. Henry on your shelves. You’ve replaced books that teach children about higher ideals with erotica and sex manuals.

7:53 AM · Dec 21, 2023 · **265** Views



Willie Edward Taylor Carver Jr. @WillieETCarver · Dec 21, 2023



You think all 673 banned books were "erotica"?

Just because y'all wanna be in a cult doesn't mean we have to be in one with you. You can act like Puritan Martyrs to justify your unresolved shame about your secret lesbian sex threesomes. Just leave the rest of us out of it.



Exhibit B



Kit Hart, American Girl ✓

@5sweetharts_



In today's episode: Grover now goes by Groomer, and Cookie Mxnster leads folx in "Mxnster Lives Matter" chant. [#Pride2023](#)



Sesame Street ✓ @sesamestreet · Jun 2, 2023

This #PrideMonth, let's celebrate diversity and unity and spread love and acceptance. Together, we can make the world a kinder place for all. ❤️🧡💛



6:08 AM · Jun 3, 2023 · 312 Views



Darlene McDonald  @iamdarlenemcd · Nov 17, 2021 

LaVerna In the Library is BLOCKING everyone that give dissenting opinions about what they're doing or books they have on their 'to ban' list. They want quiet acquiescence and appeasement. No. Not in my house. Most of these people have no idea who Toni Morrison was!

 10

 13

 99



Kit Hart, American Girl  

@5sweetharts_

Ok, groomer

8:19 AM · Dec 22, 2022 · 27 Views





Ronni Nicole #KPSS @RonniNicole1 · Feb 6



"Trans activists gatecrash Riley Gaines event with shark soft toys to MOCK one-armed pro surfer Bethany Hamilton who spoke out against biological men competing"

mol.im/a/13052413 via dailym.ai/android



From dailymail.co.uk

232

396

1K

43K



Kit Hart, American Girl ✓



@5sweetharts_

The most hateful people in the US are in the trans cult.

9:21 AM · Feb 7, 2024 · 193 Views



8





Kit Hart, American Girl @5sweetharts_



The Four Stages of Trans Cult recruitment:

- 1) Pick the right target: kids who are on the autism spectrum, victims of sexual or mental abuse, or lack social skills.
- 2) Love bombing: their “friends” on TikTok, YouTube and other platforms tell them that their unique pronouns, different name and new identity are the TRUE them. “We’re your family now” is a common slogan.
- 3) Isolation: parents who don’t affirm are the enemy. The majority of their day is spent away from family and friends, and on social media.
- 4) Keeping control: any opinion or dissent outside of their approved messages are hateful and bigoted. Even people who are gay and technically fall under the “LGBTQ umbrella” are villainized if they challenge the narrative. Those who leave - Detransitioners - are completely cut off and despised.

As parents, we need to inoculate our children with the TRUTH, and educate them on the warning signs of cults. [@ConceptualJames](#) [@BillboardChris](#) [@DrJayRichards](#)

Techniques cults use to recruit members

Hint: They hold off on talking about their alien god until much later.



...hood that person with anecdote,attery, and validation. Cult awareness educator Ronald N. Loomis described this practice on college campuses as involving “a recruiter approaching the student and doing everything [they] can to make the student feel special and unique. They’re quickly trying to convey the message that I am your new best friend. And they will fake mutual interests in order to give the impression that they share many things in common.” He also described how some cults tried to recruit members to visit outside

Picking the right target

As it turns out, most people can be susceptible to cult influence under the right conditions. Research has shown that the people who are the most susceptible to recruitment are stressed, emotionally vulnerable, have tenuous or no family connections, or are living in adverse socioeconomic conditions. New college students are a prime example of good targets for cult recruitment since they’re still forming their values for months, usually eating with the compounds going up in flames. (Credit: BOB STRONG/AFP/Getty Images)

Keeping control

After convincing you that they’re the best friends you’ve ever had and bombarding you with the cult’s ideology, the cultists’ next job is to make sure they hang on to you. There’s a variety of

Last edited 8:12 AM · Jan 14, 2024 · 31.1K Views

22

217

487

89





Kit Hart, American Girl
@5sweetharts_



Why do these people always want access to children?

@BillboardChris @RonaldSimmonsUS



Anne Arundel County Public Schools (AACPS)

8h ·



#TBT Mr. Romero attended South River High and is now a TSA at Crofton High
As an aspiring art teacher, this quote speaks to the type of art teacher I want to be one day:
"There are no mistakes, just happy accidents."-Bob Ross
Do you have a great #TBT picture to share? Please send your pictures to
communications@aacps.org with the subject line, #TBT.



#TBT

From AACPS Student to AACPS Employee

MR. ROMERO

Then



Now



5:53 PM · Jan 25, 2024 · 2,027 Views

