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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES, et
al.,

Defendants.

NO. 6:25-cv-01748-AA

SUPPLEMENTAL DECLARATION OF
MINNA CASTILLO, DEPUTY
EXECUTIVE DIRECTOR,
COLORADO DEPARTMENT OF
HUMAN SERVICES

**SUPPLEMENTAL DECLARATION OF MINNA CASTILLO, DEPUTY
EXECUTIVE DIRECTOR, COLORADO DEPARTMENT OF HUMAN SERVICES**

I, MINNA CASTILLO, pursuant to 28 U.S.C. § 1746 declare as follows:

1. I am a resident of the State of Colorado. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I am currently the Deputy Executive Director for Community Partnerships at the Colorado Department of Human Services (CDHS).

3. On September 19, 2025, I submitted a declaration in connection with Plaintiff States' Motion for Preliminary Injunction and Complaint for Injunctive and Declaratory Relief in this matter.

4. I submit the following declaration concerning Colorado's Sexual Risk Avoidance (SRAE) grant program as supplementation to my September 19, 2025 declaration. I have access to all documentation concerning Colorado's SRAE grant award and programming and regularly consult CDHS staff who are directly responsible for the administration of Colorado's SRAE grant funds. I have personal knowledge of the matters set forth below, or with respect to the matters for which I do not have personal knowledge, I have reviewed information gathered from Colorado agency records by others within CDHS.

5. Colorado has been an SRAE grant recipient since 2007. SRAE grant funds are used to support medically accurate and complete sexual education programming for Coloradans ages 10-19, which focuses on abstinence and avoiding non-marital sexual activity with the goals of reducing pregnancy, HIV and other sexually transmitted infections (STIs), and birth rates among teens.

6. In 2018, Colorado submitted a SRAE grant application in response to ACF's Funding Opportunity Announcement. Since that time, Colorado has submitted a letter of intent packet to re-authorize SRAE grants each year. ACF extends funding to grantees for two-year grant terms. Colorado applies for a new grant each year, resulting in overlapping awards.

7. ACF has issued to Colorado one currently active SRAE award covering the period from October 1, 2024, through September 30, 2026. The full allotment of this award in the amount of \$652,894.00 has recently been transferred from the Colorado Department of Education to CDHS to administer Colorado's SRAE programming. On August 7, 2025, ACF published Supplemental Terms and Conditions applicable to SRAE awards that prohibit grant recipients from including so-called "gender ideology" in SRAE-funded programs and services. Per ACF's notice, these Supplemental Terms and Conditions are effective immediately.

8. In paragraphs 17 through 21 of my September 19, 2025 declaration, I identified the harm these "gender ideology" conditions would cause to Colorado, in the context of the Personal Responsibility Education Program (PREP) grant. These harms include, but are not limited to, administrative burden and uncertainty surrounding future programming, cost of curricula changes and associated training, disruptions in the provision of programming and associated consequences to public health, and the impossibility of harmonizing the new conditions with Colorado law. Those paragraphs are incorporated herein by reference.

9. Colorado will suffer these same harms to SRAE programming, as those to PREP programming, by the implementation of the "gender ideology" conditions.

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

Executed on February 11, 2026, in Denver, Colorado.

Minna Castillo Digitally signed by Minna
Castillo
Date: 2026.02.11 16:10:07 -07'00'

Minna Castillo
Deputy Executive Director
Colorado Department of Human Services