

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

FREE SPEECH COALITION, INC.; DEEP
CONNECTION TECHNOLOGIES, INC.;
CHARYN PFEUFFER; ELIZABETH
HANSON; and JFF PUBLICATIONS, LLC,

Plaintiffs,

v.

JAMES M. LE BLANC, in his official
capacity as THE SECRETARY OF THE
LOUISIANA DEPARTMENT OF PUBLIC
SAFETY AND CORRECTIONS; JAY
DARDENNE, in his official capacity as THE
COMMISSIONER OF THE LOUISIANA
DIVISION OF ADMINISTRATION; and
JEFFREY LANDRY, in his official capacity
as THE ATTORNEY GENERAL OF
LOUISIANA,

Defendants.

CASE NO.: _____

JUDGE: _____

DECLARATION OF ELIZABETH HENSON

ELIZABETH HENSON DECLARES:

1. I submit this declaration on my own behalf in support of Plaintiffs’ Motion for a Preliminary Injunction against enforcement of La. R.S. § 9:2800.29 and La. R.S. § 51:2121 (collectively, the “Acts”), which impose liability upon any “commercial entity that knowingly and intentionally publishes or distributes material harmful to minors on the internet from a website that contains a substantial portion of such material” where

“the entity fails to perform reasonable age verification methods to verify the age of an individual attempting to access the material.”

2. I have read the Acts, including the statutory definitions referenced therein. I understand that violation of the Acts exposes the violator either to liability for “damages resulting from a minor’s accessing the material” (in the case of La. R.S. § 9:2800.29) or “civil penalties” imposed pursuant to an action brought by the attorney general (in the case of La. R.S. § 51:2121).
3. I have personal knowledge of the facts set forth in this declaration.

BACKGROUND

4. I am a veteran, having served as an active-duty member of the United States Coast Guard for almost a decade, from 2008 to 2018. During my tenure, I coordinated search and rescue operations, law enforcement activities, drug and migrant interdiction, and other missions across the United States. Following my honorable discharge and completion of a master’s degree in applied economics, I transitioned into project management, where I oversaw a multi-million-dollar project portfolio with the Oregon Department of Transportation, then managed development projects for education technology companies while I obtained a second master’s degree in project and operational management.
5. I am also a dedicated military spouse, as my husband remains an active-duty service member with the Coast Guard. Earlier this year, he received orders to relocate to New Orleans, and I’m excited about this new chapter for us in Louisiana.
6. While pornography might be a luxury for some, it’s become an essential means for me (and many military spouses like me) to alleviate the mental strain and tension experienced during the prolonged periods of separation from my husband when he is

deployed. Deployments can lead to loss of human comfort and intimacy, and a great way to ease the difficulty of this separation and meet our natural physical urges is through pornography—whether viewed alone or, especially, together a shared experience. Similar to a dinner-and-a-movie date night, mutual masturbation while watching the same sexy video together has worked to alleviate our tension and keep us close as a couple during these difficult times apart.

DENIAL OF MILITARY SPOUSES RESIDENCY RELIEF ACT PROTECTIONS

7. Upon arriving in Louisiana, I learned that my ability to access pornography in this state would be significantly jeopardized. I do not have a Louisiana ID—meaning that I cannot use LA Wallet as proof-of-age online. Because age-verifying via vendor interaction with LA Wallet appears to be the chosen method for most complying pornography sites, I am left without access to this material.
8. More critically, I will remain without access to this material going forward because I don't intend to formally change my residency from Texas to Louisiana, as doing so would result in substantial tax and legal consequences for both me and my husband.
9. Federal law protects my right to forego this residency change. In 2009, the Military Spouse Residency Relief Act amended the Servicemembers' Civil Relief Act specifically to allow military spouses to maintain legal residence in the state where they lived before a permanent change-of-station move with their active-duty service member spouse.
10. Although I understand that some adult sites might begin to age-verify via some “commercially reasonable method that relies on public or private transactional data,” I do not know of any such sites, nor do I know whether my public or private “transaction” history would reveal my age of majority.

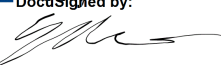
CONFUSION AND LOSS OF PRIVACY

- 11. Even if there were a logistically simple way to prove my age and obtain unrestricted access to non-obscene content on the internet, I would be too concerned for my privacy and troubled by the government overreach to comply.
- 12. Just this past week, Louisiana’s Office of Motor Vehicles was one of many government entities and major businesses to be affected by a massive data breach of third-party data transfer service MOVEit. Breaches of this sort seem to be increasing in regularity and severity, and I have no reason to expect that my sensitive information will remain secure with other vendors going forward.
- 13. Although I am comfortable admitting here that I (along with millions of other adults) view pornography, I am deeply wary of providing my identity to any entity that will effectively open the gate to adult content on the internet just to then follow me around once I’m inside. I can think of few greater intrusions upon the liberty that I served this country to protect.

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

Executed at 06/19/2023, Slide11, LA on 6/19/2023.

City State Date

DocuSigned by:

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Elizabeth Henson