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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**ANITA NOELLE GREEN**, an individual,

Plaintiff,

v.

**MISS UNITED STATES OF AMERICA, LLC**, a Nevada limited liability corporation,  
d.b.a. United States of America Pageants;

Defendants.

Case No.: 3:19-CV-02048-MO

**DECLARATION OF MARSHA LAWSON  
IN OPPOSITION TO DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT**

I, Marsha Lawson, do declare and state as follows:

1. I am over 18 years of age, competent to testify, and make the following statement based on personal knowledge.

2. I previously have worked with Mrs. United States pageant, Miss Oregon America (Miss America pageant), Miss Lane County pageant. I also owned Mrs. Oregon Divine America from 2001 to 2007. I also worked with and competed in Mrs. Oregon International.

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3. I currently serve on the chair committee of Miss Oregon Volunteer America. In that capacity I am responsible for recruiting, marketing, advertising, workshop selling, promotions, events and appearances.

4. I am the former Promotions Director for United States of America (USOA) Miss Oregon, operated by the United States of America Pageants. I held this position from March 2019 through September 2019.

5. In my position as Promotions Director, I was responsible for recruiting new contestants, coaching and teaching contestants to sell advertisement pages, getting businesses to sponsor the pageant, and other organizational responsibilities related to the Miss Oregon pageant.

6. In 2019, the USOA Miss Oregon pageant was held in Springfield and Eugene, Oregon on September 20-22, 2019 to crown the 2020 state titleholders in all four divisions. The Teen /Miss Division pageant was held first, and the Ms./Mrs. pageant was held immediately after. The two pageants had the same judges and format.

7. In 2019, USOA Miss Oregon had a short, one-page application in order to become an Oregon delegate and compete in September 2019 for a 2020 Oregon state title. The deadline to register and pay all fees was August 20, 2019.

8. Many contestants submitted applications well after January 2019 and were allowed to compete in the USOA Miss Oregon state-wide competition. I personally recruited these contestants. Several of these contestants joined USOA Miss Oregon as late as May or June of 2019. There was at least one person who became a contestant only a few weeks prior to the USOA Miss Oregon pageant and after the August 20, 2019 entry deadline.

9. Amber McMullen is the director of USOA Miss Oregon competition, and has been in that role since 2018. She also currently is the USOA Miss Washington director.

10. In 2019, USOA Miss Oregon did not engage in a selective process for choosing contestants for the USOA Oregon pageant system. At that time, the USOA national pageant was a very new pageant system, having been created in 2017, and was working extremely hard to recruit contestants and establish itself. USOA Miss Oregon was only in its second year, having had its first state-wide pageant in 2018. Miss McMullen and I heavily recruited new delegates in order to grow the pageant and increase business. That was part of my role as promotions director.

11. Because the process was not selective in order to compete in the state-wide pageant, there was no preliminary competition to become a titleholder for a particular county. A potential contestant simply submitted an application and paid the entry fee and even chose their own title, such as "Ms. Eugene" or "Ms. Lane County."

12. USOA has "rules," or eligibility requirements, but consistently bends or breaks them when convenient or when desired. Ms. McMullen has allowed contestants to join the Miss Oregon competition after the entry deadline and without paying entry fees and has violated residency requirements by allowing an Oregon resident to compete in the Miss Washington competition.

13. USOA is a for-profit organization and relies on its contestants to raise financial revenue and earn profit. As the Promotions Director, I was primarily responsible for training contestants to sell full-page advertisements for the USOA Miss Oregon pageant program book. Each contestant was responsible for selling one full-page color advertisement, which was worth

\$299. If contestants didn't sell the page advertisements, they had to personally pay USOA the \$299. Contestants spent a significant amount of their time prior to the pageant weekend making efforts to sell advertisement pages.

14. USOA Miss Oregon had an incentive program to encourage contestants to sell additional advertisements for the USOA Miss Oregon program book and earn money. This was done by offsetting contestant expenses and awarding contestants who sold the most advertisements.

15. In addition to selling page advertisements, contestants paid USOA a \$595 entry fee to participate in the USOA Miss Oregon pageant. Contestants also were required to pay for their own opening gown, evening gown, swimsuits, hair, photography, and makeup, which could cost thousands of dollars. There was no formal back-stage hair, makeup artists the night of the pageant, however, for contestants to get their required headshots during workshop, they were required to pay particular hair, makeup, and photography vendors who financially supported USOA through sponsorships.

16. The only associating through USOA that contestants do outside pageant weekend is for the purpose of promoting the Miss Oregon pageant. In 2019, the contestants were encouraged to represent USOA as part of two parades – the Florence parade, and the Fourth of July parade. The purpose was to promote the Miss Oregon pageant and recruit more contestants. There also were two workshops – one in June 2019 and one in July 2019. The purpose of these workshops was to provide the contestants with their delegate packets, get professional photography taken for the program books (which would be sold), and to teach contestants how to sell advertisement pages. During these workshops, I personally coached and

taught the contestants how to draft sponsor letters to take to businesses, friends, and family and provided other tools to increase their advertisement sales.

17. Although pageant contestants socialized on their own time, any of those events were not sponsored or organized by USOA. Outside of pageant weekend, USOA never gathered the contestants to rehearse or conduct any pageant-related activities other than to promote the pageant.

18. In January 2020 a USOA Oregon titleholder came to me to inform me that Tanice Smith had sent them the following communication attached as Exhibit A instructing them not to cooperate in this lawsuit or to speak with attorney Shenoa Payne.

19. I have always understood USOA's mission as promoting *all* women. During my time as the promotions director for USOA Miss Oregon, USOA did not express any value or belief that it sought to promote only cisgender, "natural born," or "biological" women. Such values or beliefs were never conveyed to me or conveyed to the public during USOA Miss Oregon events. I was never told by Ms. McMullen or any USOA employee to convey or teach such values or beliefs to the contestants or public.

20. In fact, I was not even aware of USOA's "natural born female" eligibility requirement until this legal action. When I learned of the eligibility requirement, I was surprised and shocked, and several of the delegates also expressed their surprise to me as well. This is because this eligibility requirement is not emphasized or promoted and is not at all central to the purpose, meaning, or mission of USOA Miss Oregon.

21. Rather, the mission and core purpose of USOA Miss Oregon is to empower women, inspire others, and uplift *everyone*, not just cisgender women.

22. I also believe the public would not understand USOA to be conveying a message to the public that it promotes only cisgender women. USOA's public conduct instead appears to promote acceptance of beauty and femininity outside of traditional gender roles in its USOA Miss Oregon pageants.

23. For example, in 2019, the USOA Miss Oregon pageant featured Bill Sullivan, a drag queen, was one of the judges of the event, who attended and judged the event dressed as a woman. The choreographer of the pageant, Christopher Dean, is an openly gay male who dressed in high heels and who wears long, painted nails, and wears jewelry such as rings, and necklaces. Another drag queen, Mark Harbaugh, whose drag queen persona is Nicole Serenity Storm (Nicole Serene), was Christopher Dean's guest of honor at the red-carpet event. Mark Harbaugh attended the event as Nicole Serene and sat next to Christopher Dean during the pageant competition.

24. Based on my experience as the former Promotions Director the USOA Miss Oregon, it is my opinion that transgender women who seek to participate in the USOA Miss Oregon competition in *any division* on the same terms and in the same manner as every other woman does not substantially interfere with the mission and values of USOA Miss Oregon, but enhances and promotes them.

I DECLARE, UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

10/21/2020  
DATED this \_\_\_\_\_ day of October 2020.

DocuSigned by:



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Marsha Lawson