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

PAM POE, *by and through her parents
and next friends, Penny and Peter Poe;*
PENNY POE; PETER POE, *et al.*,

v.
Plaintiffs,

RAÚL LABRADOR, *in his official
capacity as Attorney General of Idaho,*
et al.,

Defendants.

Case No. 1:23-cv-00269-CWD

**DECLARATION OF JANE DOE
IN SUPPORT OF
PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

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**DECLARATION OF JANE DOE IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Jane Doe, hereby declare as follows:

1. I am a Plaintiff in this action, and refer to myself here as “Jane Doe.” I make this Declaration in support of my and the other Plaintiffs’ Motion for a Preliminary Injunction. My lawyers have helped me prepare this Declaration because I am not a lawyer and I have no experience with Declarations. The facts I describe below are about my own experience, however. I have personal knowledge of them, and would testify competently to them if called as a witness.

2. I am a sixteen-year old girl. I live with my mom, dad, and siblings in Boise, Idaho, where I have lived my entire life. This fall, I will be a high school senior. After high school, I plan to attend college. I am interested in majors related to computer coding, cybersecurity, or videogame development.

3. I am transgender. I have a female gender identity, but I was designated as male at birth.

4. I have gender dysphoria, and was diagnosed with gender dysphoria by my doctor in November 2020.

5. For as long as I can remember, I knew that something felt off about my being a boy. I have always naturally related to other girls, felt the most like myself around other girls, and had similar interests as other girls. When I was younger, I did not have the words to express my feelings related to my gender identity or being transgender. But I knew it even before I knew the words for it.

6. In school, when we would be divided into girls’ teams and boys’ teams, I always wanted to be and felt like I belonged on the girls’ team. When I would play “make believe” with my friends, I was always a girl character. When I would play video games, I would almost always

choose a girl avatar. My mom and dad have told me that when I was little and my mom was pregnant with my younger sibling, I would lay down and place a doll on my stomach and tell them that I wanted to be a mom.

7. While I always felt like I was not a boy, it was difficult and scary for me to address these feelings. That distress became severe with puberty. I now understand this to be gender dysphoria. But I never tried to tell my parents about my feelings when I was young, out of my own fear of rejection from friends and the community.

8. I did not meet a transgender person, or at least someone I knew was transgender, until I was about 10 years old and met a transgender woman who was friends with my parents. My parents explained to me that their friend was transgender, that she had been born a boy but was a woman on the inside, and was now living her life as a woman. It was like hearing them describe my own life to me. Before that, I did not know that transitioning was even possible. I was immediately excited about the possibility that I could do the same one day.

9. In 2018, my body started changing as I entered puberty. It became increasingly devastating to me, and my mental health began to deteriorate. The changes to my body made me look like a boy. I remember that I would often refuse to allow my photograph to be taken during that time because of the pain it caused me seeing myself as someone I was not. I could not hide all of the physical changes, and I would often self-isolate and avoid social settings. I wanted to be social, but the pain of being perceived as a boy and seeing myself with male features was too much to bear. I also began to suffer academically at school because I could not focus on my schoolwork due to the severe mental health issues my gender dysphoria was causing me. There were times that I simply just did not want to exist because the physical changes to my body were trapping me in an existence that was not me and caused me so much pain, on a constant basis.

10. In June 2020, my gender dysphoria had intensified so badly that I needed to tell someone. I told one friend in July and then a couple more in September. In late September 2020, I finally found the courage to tell my parents that I am transgender, that I am a girl, that I was suffering, and that I needed help. My parents did not hesitate. They told me they loved me, they would support me in anything, and they just wanted me to be happy and healthy.

11. With my parents' support, I began socially transitioning in October 2020. I began going by a female first name and using feminine pronouns. I wore a feminine hairstyle and I started wearing girls' clothes. I told my mom I wanted to wear makeup and, as part of all of the ways in which she supported me when I asked for her help, she taught me about makeup and how to apply it. All of this helped my gender dysphoria, but I was still experiencing male puberty, which was causing significant physical changes to my body that I could not hide or cover up with makeup or clothes. And I knew that some of these unwanted changes would be permanent. My gender dysphoria was still causing me significant pain.

12. In mid-October 2020, my parents and I had a visit with my pediatrician to discuss what I was experiencing. My pediatrician referred me to a doctor who specializes in the treatment of gender dysphoria. My parents also found a therapist for me.

13. We had our first visit with the doctor in November 2020. The doctor examined me, asked me about my experience regarding my gender over the years, took blood for tests, and talked to me about the options for treating gender dysphoria based on my age, the risks and benefits of treatment, and things we could do to preserve my ability to have children.

14. After several months of therapy, an additional visit with the doctor, and much discussion with my parents, we decided to start on puberty blockers. I began receiving that treatment in January 2021.

15. The puberty blockers stopped any new changes from happening to my body and prevented my gender dysphoria from getting worse. Knowing that further changes would not happen was a big relief to me and improved my mental health.

16. After a few successful months on puberty blockers, we began talking about starting gender-affirming estrogen therapy. I spoke to my parents about it and during one of our visits with my doctor, he talked to my parents and me about the risks and benefits of estrogen therapy and fertility preservation, and he drew more blood for tests. Eventually, my parents and I agreed that gender-affirming estrogen therapy was appropriate for me. The doctor agreed. In April 2021, at the age of 14, I began a low dose of gender-affirming estrogen therapy.

17. Since April 2021, I see my doctor regularly for lab work, so that he can make sure I remain healthy and so he can check my hormone levels and change my estrogen dosage if needed to remain in target ranges for my age.

18. Estrogen has been amazing. It has changed my body in more feminine ways that I am so happy with. Seeing these bodily changes has helped my gender dysphoria a lot, and I feel like my body more accurately reflects who I am.

19. With the help of my parents, I began legally transitioning in 2023. My parents and I first obtained a court-ordered name change in Idaho. We then had my Idaho birth certificate corrected with my new legal name and we corrected the gender marker, changing it from male to female. My parents also helped me update my information with the United States Social Security Office and helped me obtain a United States passport with my new legal name and a female gender marker.

20. My parents and I also spoke to the administrators at my school, who were great about everything. They readily corrected my name and gender marker in my digital school records,

so that my teachers and any substitute teachers would not use the wrong name for me or the wrong pronouns and gender. This is really important to me, and I am so glad that the administrators at my school are supportive of me.

21. Being able to medically transition and see myself, and be seen by others, as the girl I am absolutely saved my life. Before I told my parents I was transgender and about the feelings of my gender dysphoria, I was not me. I was isolating myself, depressed, anxious, and I felt trapped and scared almost daily. I could not see a future for myself and did not want to exist. I am so grateful that when I told my parents about what I was experiencing, they listened to me, trusted me, and took me to providers who could give me the gender-affirming health care that I needed to be who I am.

22. My whole life has turned around. I am confident in who I am. My academics have improved. My mental health has improved substantially. I no longer feel the need to isolate, and I can live my life more fully and authentically. I am excited about what comes next in my life and everything I hope to do in the future.

23. Now all of that is at risk because of H.B. 71 and I am really scared. My parents and siblings are scared, and the others who love and care about me are scared, too. The anxiety from H.B. 71 and the possibility of my healthcare being taken away and having to go back to life as it was before I began receiving gender-affirming medical care is very stressful and harmful to my mental health. It caused me to miss a lot of school while the law was being debated. As a result, my grades suffered last semester.

24. If H.B. 71 becomes law, I would no longer be able to receive the estrogen therapy that I have been on for over two years that treats my gender dysphoria. I fear what would happen

to my mental, emotional, and physical health if my medication is cut off because of H.B. 71 and I have to resume male puberty. I have already lived that pain.

25. My parents have talked to my siblings and me about trying to find care for me out of state or selling our house and leaving Idaho—the only home I’ve ever known—because of H.B. 71. I don’t know if we can find care out of state or what it would look like to have to regularly travel for healthcare. Having to move would mean losing my friends, my family, my home, my community, my school, and everything that I have always known. It would mean the same for my parents and siblings. My oldest sibling is starting college in Idaho in the fall. I worry about what impact moving will have on him, his college plans, and our relationship. I do not want to move to a different state far away from him. I do not want any of this. I just want to stay in Idaho, my home, and continue receiving the healthcare I have been receiving that has made the life I am now living possible. But if H.B. 71 goes into effect, my family understands that this healthcare is so central to my wellbeing that we will likely have no other choice but to move out of Idaho.

26. I ask that the Court please help me. Please do not let my healthcare be taken away.

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

Executed in Idaho, on this 18th day of July, 2023

Jane Doe
Jane Doe