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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 PAM POE
IN SUPPORT OF
PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

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**DECLARATION OF PAM POE IN SUPPORT OF
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

I, Pam Poe, hereby declare as follows:

1. I am a fifteen-year-old transgender girl, living with my mom, dad, and sibling in Meridian, Idaho. I am a Plaintiff in this lawsuit and call myself "Pam Poe." Our counsel have explained to me and my family what a preliminary injunction is, and we eagerly join the other Plaintiffs in seeking an injunction. Our lawyers have helped me prepare this Declaration, but the story below is mine. I have personal knowledge of the facts I explain below, and I would testify to them if called as a witness.

2. I have lived in Meridian, Idaho my entire life. I will be a sophomore in high school beginning in August 2023. I am interested in engineering, programming, and math. During the summer, I have a part-time job. This year is my second year working there.

3. While I am a girl, I was designated male at birth. Growing up, I always felt different, like I was not really a boy, but I did not know how to describe those feelings. I also did not know how to describe the mental and emotional distress I began experiencing as I got older because I knew that my gender was wrong. I know that I am a girl, not a boy. I just want to live and be treated like any other girl.

4. Around the time I was in 7th grade, as I began to experience puberty, I noticed how heavily I was struggling with depression, anxiety, and thoughts of self-harm. I started engaging in acts of self-injury. I did not really understand why exactly, but I was in a very dark place. During that time, there were times I felt like I did not want to exist anymore because I was so unhappy with what was happening to my body, feeling trapped and not like myself, and because people saw me as a boy and addressed me as one.

5. Eventually, these feelings became so overwhelming that I finally told my mom what I was feeling in August 2021.

6. I remember that moment clearly. We had a bunch of family over at the house, but I was feeling uncomfortable with myself, so I stayed in my room for most of the evening. As it got late that night, I realized that I could not wait any longer. I had to tell my mom my truth. I had been wanting to tell her for so long, but I was scared. I decided to text her and come out. I told her that I was non-binary (I was still exploring my gender identity and knew I was not a boy, but did not yet understand that I am a girl), that I wanted to be called "Pam," and that I wanted people to use different pronouns in referring to me. I was not sure how or if she was going to respond, because it was so late and she was entertaining family. But she did respond. She used my new name and told me that she loved me, and that we would talk about it in the morning, when things were quieter and we would have more privacy.

7. The next morning my mom came into my room. She sat by me on the floor and hugged me. She told me that she loved me. It was very emotional, but I was so happy that she accepted me. Because we still had family in town and some staying with us, we also talked about who knew, who did not know, and who we should avoid finding out for now. My mom was already trying to protect me, and that also made me feel very happy, safe, and loved.

8. I continued to try to understand my gender identity and who I am. Not long after coming out, I told my parents I was more comfortable with she/her pronouns. I knew I didn't feel like a boy and was coming to realize I didn't have to force a masculine presence on myself. I was still exploring whether nonbinary, transgender, or no gender felt like the right label for how I was feeling. I stopped trying to be the boy that society told me to be, and I focused on presenting my true self.

9. My parents found a counselor, who I started seeing weekly. He diagnosed me with depression. Even with counseling, I continued to struggle. Due to puberty, my body was still changing in ways that were making me feel miserable, because with every change, I became more and more physically a boy, and I just knew that was not who I was.

10. One day in early 2022, I sent my mom a text at 2am because I did not want to wake her, asking for admission to hospitalized care. I told her that I did not want to be alive anymore. It was hard to describe to her how I was feeling at the time. I decided that an inpatient stay at a residential treatment facility would help me and provide me with greater support. With my parents' support, I entered residential treatment at the end of February 2022 and stayed there for one week. During my time in inpatient treatment, I opened up more to one of the providers I was seeing about my gender identity and the distress, depression, and anxiety around my body. That provider diagnosed me with gender dysphoria, in addition to my depression and anxiety.

11. Before, when I thought about the possibility of being diagnosed with gender dysphoria, I had assumed it would be something negative and that I would feel shame about the diagnosis. However, when I received the diagnosis, I felt relief and validation. I felt like I had permission to stop fighting my identity and pretending to be someone I wasn't. My body and its developments were causing me severe dysphoria, because I was unable to be seen by others as a girl, or even a feminine human being

12. After I left the residential treatment facility, I was referred to a doctor who is an expert in treating gender dysphoria. Unfortunately, the next available appointment was not until a few weeks later, in May 2022.

13. At the appointment, my doctor evaluated me, talked with my parents and me about the possibility of me being treated with puberty blockers, and discussed with us the benefits of

treatment and the risks. I also had blood drawn to figure out where my body was, in terms of puberty. I remember leaving that first appointment with a huge smile and feeling just overwhelmed with relief . Learning that puberty blockers were possible and that they would stop the changes happening to my body took a huge weight off my shoulders and helped my mental health.

14. At my next visit with the doctor, after again discussing everything we discussed at the first meeting, my parents and I, along with the doctor, decided that puberty blockers were the right treatment for me. I began puberty blockers in June 2022. I just felt so happy and relieved because I knew that it was going to stop what was happening to me. My mental health started to improve and only continued to improve over the next few months.

15. A counselor had been recommended to us as someone with experience caring for people with gender dysphoria, and after several months on the waitlist, I began therapy with her in July 2022.

16. With my parents' support, I had begun socially transitioning after coming out to them. I started wearing more feminine clothing, wearing makeup, and dying my hair and growing it out. Making these changes made me feel more like myself. Seeing that that my family saw me, accepted me, and treated me as who I really am also made me feel more like myself.

17. Being able to be myself, because of the puberty blockers and socially transitioning, I became more confident. I was already out to my close friends and family, and I realized I was ready to reintroduce myself, my real self, to other people in my life. When I started high school in August 2022, I entered as a girl and have been treated as a girl since day one.

18. Socially transitioning helped me feel like I wasn't hiding when I was in public. I felt more confident that people were seeing *me*, not the masculine role I was assigned. It didn't alleviate all of my distress though. I still constantly worried about people seeing certain parts of

me that are not in line with my gender identity and expression. Puberty blockers paused more changes to my body that did not align with my gender identity, and I was still having a lot of gender dysphoria about the ways my body didn't align with my gender identity.

19. In April 2023, after being on puberty blockers for almost a year, my parents and I had a conversation with my doctor about starting estrogen therapy. My doctor performed more bloodwork, talked to us about the potential risks and benefits of estrogen therapy, discussed options for fertility preservation, and confirmed my ongoing therapy and mental health support. My parents and I, in talking with my doctor, decided that estrogen therapy was the best and appropriate treatment for my gender dysphoria. I started treatment and I have been on estrogen ever since. Just like with the puberty blockers, the estrogen therapy has made such a difference in my life. My mental health is the best it has ever been. I am feeling more confident, happy, and excited that I am developing as a girl.

20. Before I began gender-affirming medical treatment, I was in a very dark place. I struggled so hard, with anxiety, depression, hiding away by myself, thoughts of self-harm, and even harming myself to cope with it all. The changes because of male puberty were making me miserable and causing all of those bad symptoms. I could not see a future for myself and did not want to exist. Gender-affirming medical care saved my life. When I think back to that time, it makes me sad. I know it really scared my parents. It scared me too. I did not want to die, I just wanted to be myself, my true self. I am so glad that I told my parents about what I was struggling with. I wish I had told them sooner.

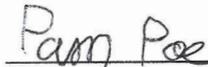
21. It is hard for me to find the words to explain the difference in my life now that I am receiving gender-affirming medical care and living as the girl that I know I am. I am happy and confident. I am excited about the future I see for myself.

22. That is also why I am incredibly anxious and scared about H.B. 71. My entire family is very scared. If H.B. 71 becomes law, I would have to stop receiving the medical treatment that has saved me. I have already lived through the extreme mental health symptoms of not receiving treatment and I never want to experience that again. I cannot go back to that.

23. If H.B. 71 becomes law, my parents have talked about moving out of Idaho when my sister graduates from high school next year. We also talked about traveling to get care, but that would be a significant financial burden for my family. If we move, I will leave the only home I have ever known, my close community of friends, and my healthcare providers, who I trust, who have supported me, and who have changed my life for the better. I do not want to leave. I want to stay in Idaho, in my home, and continue receiving the healthcare I need. Please, please do not let this law take effect.

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

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



Pam Poe