

Exhibit K

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC.; *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States; *et al.*,

Defendants.

Civil Action No.

DECLARATION OF DYLAN DOE

I, Dylan Doe,¹ pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Dylan Doe. I am a Plaintiff in this action. I offer this Declaration in support of Plaintiffs' Motion for Preliminary Injunction. I am over 18 years old, have personal knowledge of the facts set forth in this Declaration, and would testify competently to those facts if called as a witness.

2. My family is a member of PFLAG.

3. I am a transgender man and 18 years old. My sex assigned at birth was female, but I am male.

4. When I was a little kid, I remember wishing on dandelions that I would wake up as a boy. There were many times when I knew that I felt like a boy, not a girl. In first grade, I got a pair of black and blue sneakers, instead of pink ones like I'd been wearing. They were awesome and I loved them. But then when I went to school, other kids made fun of me, and teased me by

¹ Dylan Doe is a pseudonym. I am proceeding under pseudonym to protect my right to privacy and myself from discrimination, harassment, and violence, as well as retaliation for seeking to protect my rights.

asking if they were my brother's sneakers. I didn't want to wear them after that. On standardized tests in school, there would be bubbles to fill out at the top that said male or female. It always felt off to me when I saw that it was filled in female on my answer sheets. When I would play pretend with my friends, I played boy characters. I would come up with new names for myself, even when not playing pretend, because I didn't like my birth name, which was feminine.

5. In fifth grade, I cut my hair short. That summer, a lot of people thought I was a boy, and it felt good to be seen as a boy. I then started to go through female puberty, which I hated. It was an anxiety-filled experience. The day before sixth grade, I got my period for the first time. I had already been anxious about that, and when it happened, it felt totally wrong that female puberty was happening to me at all.

6. Although I had known that trans women existed, I didn't learn that there were actually trans men, too, until sixth grade when I was 12. At that moment, I realized – this is it. This is me. I spent maybe two months keeping those feelings to myself, though, and didn't tell my parents. My mom could tell that something heavy was weighing on me, but she didn't know what it was, just that I had started to withdraw from my life. One day, when my mom was driving me home, I just started crying and she asked me what was wrong. I told her that I felt better thinking about myself as a boy. After I told her, I just felt so relieved. It felt great to finally be known and seen. My parents were both supportive and loving. When I told my sister, she said that she already knew I was her brother.

7. At that point, we started using he/him pronouns for me at home. I cut my hair, which had been down to my shoulders, to be much shorter and masculine. I already dressed pretty androgynously, but I also bought more masculine clothes, including emo band t-shirts.

8. I also wanted to pick a new name. I had a few ideas at first, and then I asked what my parents would have named me if my sex at birth had been male. My dad said, “Dylan.” That was a name I had already been considering. When I heard my dad say that name, it felt good. Now “Dylan” has been my name for so many years, it just feels right, like it was always supposed to be my name.

9. I told a few of my friends at school, at the end of sixth grade. I didn’t tell my teachers or many other people because I knew that I would be switching schools for seventh grade. My friends at the new school were all great and supportive, and no one was weird. New people that I met just thought I was a boy, which was nice. But some of my classmates who knew me from before still treated me as a girl, which continued to feel wrong.

10. My mom found a therapist who specialized in working with trans people. I started seeing her in about 2019, when I was 12. She was the best. I saw her every three or four weeks – I would have seen her more frequently, but she had a very busy schedule. She also ran a therapy group for trans middle schoolers, which I joined. Knowing that I wasn’t the only one helped me, and I could talk to them about things in my life that only other trans people would understand.

11. My therapist diagnosed me with gender dysphoria. She also said that there were two doctors in our part of Tennessee who would treat gender dysphoria in adolescents: one in private practice, and another at a major hospital. My mom wanted me to see the doctor at the major research hospital in part because she knew that the rest of our extended family would be skeptical about me being transgender, and she wanted them to know we had done our research and she had taken me to a major hospital to figure out what to do about my gender dysphoria.

12. My first appointment with the endocrinologist at that hospital was in seventh grade. It took us a long time to get that appointment.

13. I talked with the doctor, as did my parents, about how female puberty was so upsetting to me, especially getting my period. That was my main focus when talking to the doctor because that is one of the things that made me feel the most dysphoric about my body.

14. Because I had just started puberty, one option for me was puberty blockers. We talked with the doctor about the risks, benefits, and alternatives. What stuck out for my parents was the potential concern about bone density. I got x-rays and other tests to measure bone density and bone age. My mother felt reassured because the doctor explained the research, and it seemed like those potential risks to bone health could be monitored and dealt with.

15. For me, I understood that the puberty blockers were temporary, that I would need to get a shot every three months for them to work, and that it would give me more time to make a decision about what kind of puberty I wanted to go through.

16. I started getting puberty blocker shots in the spring of 2020, when I was 13. Starting blockers was best thing ever. Getting those shots made me feel less of a sense of panic. I thought, “I can stop my body from turning me into a girl.” The shots also stopped my period, which was huge, because of how dysphoric that made me feel. I had one less thing to worry about, and I felt I now had more time to think about my identity. I knew eventually I could make a decision about hormones on my own time frame.

17. When I was closer to 14 years old, I talked to my doctor with my parents about potentially taking testosterone, including the side effects and what could or would happen. We all discussed the expected effects like body hair, my voice changing, and my face and body shape becoming more masculine. Those were all things I wanted to happen. We talked about potential side effects, like male pattern baldness, but the benefits outweighed the negatives. We also talked about fertility. I felt back then, as I still do now, that I had no interest in having biological children

or being pregnant. I knew that I would need to go through some additional female puberty to have biological children be an option, and I did not want to do that, then or now. Even before I told my mom that I was trans, I knew I wanted to adopt kids. My parents were supportive of that. I also knew that being on testosterone would help feel more comfortable in my own skin, and make my body look the way I see myself. It would also help other people see me the way I see myself and treat me the way I wanted to be treated.

18. Testosterone helped me very much. I started testosterone in eighth grade, when I was 14. I started first at a low dose, which went up gradually over time. I also had frequent blood tests to make sure what the appropriate dosage was. My doctor checked in to make sure that I liked the changes I was seeing and didn't have side effects that I didn't want. I was relieved that my body had started to develop through male puberty, and it felt like my body was developing the right way.

19. My parents also changed my birth certificate to show my new name and a male sex marker. That was completed in 2021. I have also changed my passport to reflect my identity as male.

20. By the time I started ninth grade, in the fall of 2021, no one who met me for the first time had any idea I was trans. I knew a couple people from before I transitioned at my new school, but even some of them only saw me as a boy. One classmate even said how weird it was that I looked just like this girl she knew in sixth grade.

21. When I started ninth grade, it became clear after a few days that the high school, and Tennessee, was not a welcoming place for me. The principal was not clear with my family whether I could use the boys' restroom after Tennessee's restroom ban, or if I would have to use a single-user restroom that only teachers could access, meaning I'd have to ask for their key card

every time I had to go. My mom was worried about my safety, and whether I'd be treated like a normal student. It also seemed like it would be harder and harder to get gender affirming medical care for me in Tennessee.

22. Based in part on wanting to keep me safe, my parents decided that our family would move to Massachusetts, and we moved in time for me to start ninth grade again.

23. When I met all of my new friends, no one had any idea I was trans. I was not super closed off about it, so I would sometimes tell people if it came up. When I told people I'm trans, most people were surprised and said they had no idea, which felt great.

24. Living in Massachusetts has been wonderful. My school specifically and my school district generally are very welcoming and inclusive. After moving, there have been barely any moments where I've felt different from other people because I'm trans. There are sometimes moments where I think that the cisgender guys in my class don't fully understand my experience, but it is nothing like how people would talk about me in Tennessee or misgender me on purpose. At my old middle school in Tennessee, I wasn't allowed to change my name on my school email address. But at my new school in Massachusetts, I didn't need to worry about that, because I had legally changed my name and gender, and it was a more welcoming environment in Massachusetts. My school has LGBTQ pride events every year, and in my English class, we read books about queer people. I feel comfortable talking to people about being trans when I want to. I also feel comfortable growing my hair longer, because I know I am less likely to be misgendered by doing so. Sometimes, because of my longer hair, sometimes people will assume that I'm a girl, especially if I'm hanging out in a group of girls, and will say something like, "Hello, ladies." But as soon as I talk and they hear my deep voice, they immediately apologize. I know that kind of mistake is not because they think I'm trans, but rather because of my longer hair. But when it happens and they

realize their mistake, they are embarrassed, not me. My voice is deep enough now that I never get misgendered after people talk to me.

25. I have a full life in Massachusetts. I go to school, have friends, volunteer in my community, and have a job. I feel safe and seen here.

26. I had to find a new doctor when we moved to Massachusetts. There was a long wait list, but my doctor in Tennessee helped me find a new provider. I have been going to that same provider since we moved here four years ago. I also found a new therapist, who I have been seeing every week since we moved to Massachusetts.

27. With my doctor's help, I have tried a couple different ways of taking testosterone to find the right method for me, that helps me feel the way I want to and also stops me from getting a period. It sucks when I have breakthrough menstrual bleeding because it makes my gender dysphoria worse. Eventually, I found a method—a long-acting form of testosterone that lasts for four months—that helps address that issue. Every four months, I go to the doctor's office for a procedure that allows me to receive a long-acting form of testosterone. I also go to the doctor every three or four months for injections of another medication to help stop menstruation.

28. On Tuesday, January 28, 2025, the White House issued an Executive Order entitled "Protecting Children from Chemical and Surgical Mutilation" ("Executive Order").

29. I first learned about the Executive Order on social media. At first, I did not think it was real.

30. I had an appointment scheduled for January 31, 2025, where I was supposed to receive testosterone as I normally do.

31. The day before, on January 30th, a provider from the clinic called to say that my appointment was canceled and would need to be postponed because of President Trump's

Executive Order. I have not yet heard anything about getting a new appointment for testosterone. I am still looking for a new provider.

32. This health care makes my life livable. When I think about losing access to testosterone or the physical effects of gender-affirming care, I get so depressed and cannot function. This healthcare is an essential part of my life. I used to be so, so anxious about not passing as male. It made my life smaller. I want to be able to live my life like any other person, and not be worrying about whether I can continue to access medical care, whether my body will look the way I see myself, or whether other people will see me as trans. I am now a senior in high school, and I haven't had to worry about "passing" as a boy since my freshman year. Now, that worry is back.

33. My access to this health care influences the decisions I think about, including whether I can travel. In a perfect world, no trans person would need to worry about being misgendered or people being violent toward them, whether they take hormones or not. But being on testosterone makes me feel like myself, and also safer, because I don't have to worry if people won't accept me because they suspect I am trans. When I am taking testosterone, I can just be myself without any extra qualifier of, this is Dylan, but he's trans. Instead I can just be Dylan.

34. Next year, I am going to college to study linguistics. I speak three languages and am working on learning two more. I want to help preserve endangered languages.

35. I hope this Executive Order is stopped so that trans young people and young adults like me across the country can continue to access gender affirming medical care. If the Executive Order is not stopped, and I cannot access this healthcare for another year, I will be devastated. I do not know how I will be able to find the medical care I need—I may have to travel abroad. Receiving this medical care as an adolescent has allowed me to become the adult I am today, and I should not have to leave my doctor or my country to continue to live my life.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Dated this 11 day of February, 2025



Dylan Doe