

**IN THE 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. BAH-25-337

**DECLARATION OF OMAR GONZALEZ-PAGAN IN SUPPORT OF PLAINTIFFS'  
MOTION FOR A PRELIMINARY INJUNCTION**

I, Omar Gonzalez-Pagan, hereby declare and state:

1. I am over 18 years of age, of sound mind, and fully capable of making this declaration. I have personal knowledge of the facts set forth in this declaration, they are true and correct, and I would be able to testify about these facts if I were called as a witness at a hearing or trial.

2. I am a licensed attorney in the Commonwealth of Massachusetts and the State of New York. I am Senior Counsel and Health Care Strategist at Lambda Legal, and counsel for Plaintiffs in this action.

3. I submit this declaration in support of Plaintiffs' Motion for a Preliminary Injunction.

4. On January 31, 2025, Defendant Health Resources & Services Administration ("HRSA") transmitted via email a notice to recipients of HRSA grants, instructing them to comply with the executive orders at issue. **Exhibit A-1** is a true and correct copy of that email notice.

5. Upon information and belief, on January 31, 2025, as part of its implementation of Executive Order 14,168 (the “Gender Identity Order”), the Centers for Disease Control and Prevention (“CDC”) sent a letter to a health center in California terminating a federal grant. The letter stated, in part, that the recipient “must immediately terminate, to the maximum extent, all programs, personnel, activities, or contracts promoting or inculcating gender ideology at every level and activity.” **Exhibit A-2** is a true and accurate copy of the notice that accompanied that grant termination.

6. On January 30, 2025, Children’s National Hospital issued a statement announcing that it is pausing care in response to the executive orders at issue. *See Children’s National Hospital Statement on Executive Order* (Jan. 30, 2025), <https://www.childrensnational.org/about-us/newsroom/2025/statement-on-executive-order>. **Exhibit A-3** is a true and correct copy of that statement.

7. On or about January 30, 2025, Children’s Hospital of Richmond at VCU issued a statement on its website announcing that it is pausing care in response to the executive orders at issue. *See Transgender, Children’s Hosp. of Richmond at VCU* (Feb. 1, 2025), <https://www.chrichmond.org/services/transgender/>. **Exhibit A-4** is a true and correct copy of that statement.

8. On or about January 30, 2025, UVA Health issued a statement on its website announcing that it is pausing care in response to the executive orders at issue. *See Gender Health Services Impacted by Executive Order, UVA Health*, <https://childrens.uvahealth.com/services/transgender-youth-health> (last visited Feb. 1, 2025). **Exhibit A-5** is a true and correct copy of that statement.

9. On February 14, 2025, the day after the Court issued a temporary restraining order in this matter, UVA Health resumed offering gender affirming care to patients under 19. In a statement provided to 29 News, UVA Health wrote, “UVA Health will continue to monitor legal developments in this case and provide our patients with the best care possible under Virginia and federal law.” *See* Maggie Glass, *UVA Health resumes gender-affirming care for people under 19 years old*, 29 News (Feb. 14, 2025), <https://www.29news.com/2025/02/14/uva-health-resumes-gender-affirming-care-people-under-19-years-old/>. **Exhibit A-6** is a true and correct copy of the news report covering this denial of care.

10. On or about January 30, 2025, Denver Health issued a statement on its website announcing that it is pausing care in response to the executive orders at issue. *See Denver Health responds to executive order regarding gender-affirming care*, Denver Health (Jan. 30, 2025), <https://www.denverhealth.org/news/2025/01/denver-health-responds-to-executive-order-regarding-gender-affirming-care>. **Exhibit A-7** is a true and correct copy of that statement.

11. On January 30, 2025, Jason Miyares, Attorney General of the Commonwealth of Virginia, transmitted a letter to the University of Virginia and Virginia Commonwealth University directing them to comply with the executive orders at issue. **Exhibit A-8** is a true and correct copy of that letter.

12. Since Plaintiffs filed their complaint and motion for a temporary restraining order on February 4 and 5, 2025, respectively, additional hospitals cut off necessary care for transgender patients under age nineteen.

13. On February 5, 2025, Children’s Hospital of Colorado sent a letter to patients and their families of the TRUE Center for Gender Diversity, announcing that in light of the January 28, 2025 Denial of Care Order (Executive Order 14,187), it “will transition its model of gender

affirming care” and cease offering hormone-based care “for any patient under 19 years of age” because the executive order “threatens Children’s Hospital Colorado’s ability to provide care for the many children who rely on us.” Children’s Hospital of Colorado further stated, “We recognize the grief and anxiety that these changes will bring for the patients and families who have shown unwavering dedication and commitment to supporting children in embracing their true selves.”

**Exhibit A-9** is a true and correct redacted copy of this notice.

14. In addition, several hospitals have stopped initiating care for new patients. On February 4, 2025, Children’s Hospital Los Angeles issued a statement that it was pausing the initiation of hormonal therapy due to the executive orders. *See* Emily Alpert Reyes, *Children’s Hospital L.A. Stops Initiating Hormonal Therapy for Transgender Patients Under 19*, L.A. TIMES (Feb. 4, 2025), <https://www.latimes.com/california/story/2025-02-04/childrens-hospital-to-stop-initiating-hormonal-therapy-for-trans-patients-under-19/>. **Exhibit A-10** is a true and correct copy of the news report covering this denial of care.

15. On February 7, 2025, Corewell Health became the first medical system in Michigan to announce that it would be officially “limiting gender-affirming care for minor patients.” In a statement provided to the Detroit Free Press, Corewell stated that they would not be “beginning any new hormone therapy regimens for minor patients seeking gender affirming care. **Exhibit A-11** is a true and correct copy of the news report covering this denial of care.

16. On or about February 12, 2025, Corewell Health reversed its decision and resumed hormone therapy for patients under 19. *See* Georgea Kovanis, *Corewell reverses decision on starting treatments for trans minors*, Detroit Free Press (Feb. 12, 2025), <https://www.freep.com/story/news/health/2025/02/12/corewell-health-hormone-therapy-gender->

affirming-treatment-transgender/78460390007/. **Exhibit A-12** is a true and correct copy of the news report covering this resumption of care.

17. In Arizona, multiple providers have confirmed they are restricting gender affirming care, including medications, due to the Executive Orders. On February 10, 2025, Children’s Hospital of Phoenix sent an email to patients informing them that “after careful review of the executive order issued on January 28, 2025, surrounding gender-affirming medical care for children under the age of 19,” “Phoenix Children’s is indefinitely pausing gender-affirming medical care, specifically puberty blocking and gender-affirming hormonal therapy.” **Exhibit A-13** is a true and accurate copy of that notice.

18. On February 11, 2025, another Phoenix-based provider confirmed it was no longer providing certain gender affirming care services to patients under the age of 19. Prisma Community Care in Phoenix, Arizona—one of America’s oldest and largest LGBTQ+ clinics—stated, “Due to President Trump’s executive order,” it was “no longer able to provide gender-affirming hormone therapy to patients under 19.” See Joseph Darius Jaafari, Phoenix -Based LGBTQ+ Clinic Stops Providing Gender Affirming Care to Minors, TUSCON SENTINEL (Feb. 11, 2025), [https://www.tucsonsentinel.com/local/report/021125\\_phx\\_gender\\_care/phoenix-based-lgbtq-clinic-stops-providing-gender-affirming-care-minors/](https://www.tucsonsentinel.com/local/report/021125_phx_gender_care/phoenix-based-lgbtq-clinic-stops-providing-gender-affirming-care-minors/). **Exhibit A-14** is a true and correct copy of a news report reporting on this termination of care.

19. On February 14, 2025, following the temporary restraining order in this matter, Prisma Community Care issued a statement announcing that it would resume all of its gender-affirming care, including hormone therapy, for patients under 19. See Stephanie Innes, *Phoenix clinic to resume gender-affirming care for children paused by Trump order*, AZ Central (Feb. 15, 2025), <https://www.azcentral.com/story/news/local/arizona-health/2025/02/15/az-clinic-to->

resume-gender-affirming-care-transgender-people-under-19/78625587007/. **Exhibit A-15** is a true and correct copy of a news report reporting on this resumption of care.

20. On February 3, 2025, the White House issued a News Release entitled, *President Trump is Delivering on His Commitment to Protect Our Kids*, touting that the executive orders at issue are “already having [their] intended effect.” **Exhibit A-16** is a true and correct copy of that News Release.

21. Upon information and belief, on February 11, 2025, after Defendant HHS was ordered to restore webpages it had taken down pursuant to the Gender Identity Order, Defendant HHS’s subagencies appended notices to these webpages that the “Administration rejects gender ideology and condemns the harms it causes to children, by promoting their chemical and surgical mutilation . . . This page does not reflect biological reality and therefore the Administration and th[e] Department reject[] it.” **Exhibits A-17 and A-18** are true and correct copies of this language on webpages maintained by the U.S. Food and Drug Administration and the CDC.

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

Executed on this 18th day of February, 2025.

/s/ Omar Gonzalez-Pagan  
Omar Gonzalez-Pagan