

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CARTER COE, by and through his parent
and next friend, CAROLINE COE; et al., *on
behalf of themselves and all similarly
situated,*

Plaintiffs,

v.

TODD BLANCHE, in his official capacity as
Acting Attorney General of the United States;
et al.,

Defendants.

Case No. 1:26-cv-04641-JAV

DECLARATION OF KARL KOE

I, Karl Koe, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Karl Koe.
2. I am over 18 years old, have personal knowledge of the facts set forth in this Declaration, and will testify competently to those facts if called as a witness.
3. I am a Plaintiff in this action.
4. I offer this Declaration in support of Plaintiffs' Motions to Proceed Under a Pseudonym, for a Temporary Restraining Order, and for Class Certification.
5. I am transgender. I live in New York, New York.
6. Karl Koe is a pseudonym.
7. I am submitting this declaration under a pseudonym because I fear that disclosure of my identity would subject me to a substantial risk of harm, including harassment, violence, and retaliation.

8. I am aware that transgender people are subject to inordinate and disproportionate amounts of violence, harassment, and discrimination. I am also aware of targeted violence as a direct response to the provision of gender-affirming medical care to minors. Accordingly, I am concerned that making my identity public would endanger our safety and subject my family and I to violence and harassment.

9. In addition, I am concerned that public identification could expose me to retaliation by the current administration. Based on media reports, I am aware that the current federal administration has targeted those who support transgender care or oppose the administration's priorities.

10. I have read the proposed class definition in the complaint. I am willing to act on behalf of other persons in the class similarly situated to me. If appointed, I will look out for the interests of all class members. I am not aware of any conflict I may have with any proposed class members.

11. I obtained gender-affirming chest masculinization surgery through NYU Langone Hospital, within the time range between January 1, 2020 and May 5, 2026. I also received testosterone to treat gender dysphoria, also within that time range, through Mount Sinai Health System.

12. In the process of obtaining that care, I had to divulge a significant amount of private, sensitive medical information, including by providing a letter of support from a mental health professional, which contained significant discussion of my medical history and other deeply private details. I knew these discussions were necessary as part of the process of assessing me and ensuring my readiness to obtain the care. I never thought that this private information might be revealed to the government.

13. I am aware that, in May, NYU Langone received a criminal subpoena from the U.S. District Court for the Northern District of Texas, and that some of the records related to the care that I received at NYU Langone appear to be within the scope of some of the subpoena's requests and is subject to disclosure.

14. I do not consent to any such disclosure.

15. The prospect of the government accessing this information worries me deeply. With escalating threats to gender-affirming medical care, it is hard enough to obtain it—I feel that this kind of effort seems intended to intimidate patients and make it even more difficult to obtain.

16. I not only worry about the status of the private medical information that I discussed with my providers related to gender dysphoria, but also about wholly unrelated information that now feels vulnerable to being revealed or disclosed to the government.

17. Worrying about how the government will handle my records is concerning enough, but I also worry about the consequences of unrelated medical information being leaked or unintentionally revealed. I am concerned about the embarrassment or social consequences of my private information being revealed to my professional and social networks.

18. It should not be legally permissible for my private medical information to be turned over. My medical care should be between me and my providers.

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

Executed on: May 30, 2026

By:

Karl Koe

Karl Koe