

# **Attachment 13**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

PETER POE, et al.,

*Plaintiffs,*

v.

GENTNER DRUMMOND, et al.,

*Defendants.*

Case No. 23-cv-00177-JFH-SH

**DECLARATION OF RACHEL ROE IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

I, Rachel Roe,<sup>1</sup> declare as follows:

1. I am over 18 years of age, of sound mind, and in all respects competent to testify.
2. I have personal knowledge of the facts set forth in this Declaration and would testify competently to those facts if called to do so.
3. I am a Plaintiff in this action. I am bringing claims on behalf of myself and, along with my husband, Richard Roe, as the parent and next friend of my son, Ryan Roe.
4. I live in Oklahoma, along with my husband, Richard Roe, and our son, Ryan Roe.
5. My son, Ryan Roe, is 14 years old. I love him, support him, and wish to provide what is best for him throughout his life.
6. Ryan is transgender. When he was born, his sex was designated as "female," even though he is a boy.

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<sup>1</sup> Rachel Roe, Richard Roe, and Ryan Roe are pseudonyms. My son (who is a minor) and I are proceeding under pseudonyms to protect our right to privacy and ourselves from discrimination, harassment, and violence, as well as retaliation for seeking to protect our rights.

7. Throughout his childhood, Ryan expressed himself and behaved in a manner that does not conform with the stereotypes associated with the sex he was designated at birth. At around the age of 10, Ryan began evaluating his gender.

8. As a mental health professional, I know how important it is to allow your child to express himself and explore who he is.

9. As he approached puberty, however, Ryan began experiencing depression. He had anxiety and loss of appetite. During this time, Ryan started working with a therapist.

10. Because he did not conform with stereotypes about his sex assigned at birth, Ryan experienced from third to sixth grade. After sixth grade, Ryan changed schools.

11. In 2020, Ryan informed us he is a transgender. He is out to his family, friends, and school.

12. Ryan was diagnosed with gender dysphoria.

13. In 2021, at the recommendation of his therapist, we began working with medical professionals experienced with treating gender dysphoria. Following the advice of his medical team, Ryan was placed on period blockers in late 2021 and puberty-delaying treatment in early 2022. His medical team continuously monitors his hormone levels to ensure that they are working.

14. The combination of a supportive school environment, therapy, gender-affirming treatment for gender dysphoria care, and living and being recognized as his true self—as a boy—has significantly improved Ryan’s mental health.

15. As a mother and as a mental health professional, I have observed how being able to obtain medical treatment for his gender dysphoria has had a dramatic and positive impact in Ryan’s wellbeing. It has allowed Ryan to thrive and become a confident and eloquent young man, who can advocate for himself and excel in school.

16. Being able to be affirmed as to who he is has brought Ryan significant relief and allowed him to thrive.

17. If S.B. 613 (the “Health Care Ban”) were to take effect, however, Ryan’s puberty-delaying treatment will be cut off.

18. I worry about the potential physical and mental health consequences of depriving Ryan of the medical care he needs and of Ryan being forced go through a puberty inconsistent with his male identity.

19. We have lived in Oklahoma all our lives. It is our home. However, ensuring the health and wellbeing of my son is paramount to me.

20. That said, moving out of Oklahoma is not a realistic option for us. Due to some familial obligations, I am unable to move out of state. As such, to ensure that Ryan has access to the medical care he needs, we have considered having Ryan move with one of my siblings in the East Coast.

21. The Health Care Ban would require us to choose between the healthcare and wellbeing of Ryan, or the physical separation of our family and separating Ryan from his long-term health care providers and friends.

22. Not providing Ryan with the medically necessary treatment recommended by his doctors and that Ryan requires is not an option for us, however. To the contrary, I believe providing Ryan with the gender-affirming care he requires is necessary to ensure his health and well-being, which is the most paramount consideration for me as a mother.

23. Oklahoma is our home. We are part of a community, comprising family and friends that have been supportive and affirming of Ryan’s identity. I worry about the effect that the Health Care Ban will have on other transgender adolescents, like Ryan, and families, like ours.

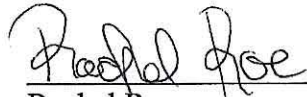
24. Our family is as much a part of Oklahoma as any other family, and Ryan has the same right to opening live with his identity as any other person in this state.

25. I cannot understand how someone would say that this medical care that has made such an enormously positive impact on my son, who has is now thriving and happy as opposed to when he was not affirmed as who is, should be prohibited.

26. We don't think it is ok, nor do we want, to have the government come into our doctors' offices and make decisions about our health care.

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

Executed this 7<sup>th</sup> day of April 2023.

  
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Rachel Roe