

Exhibit

6

CAUSE NO. _____

LAZARO LOE, *et al.*,

Plaintiffs,

v.

THE STATE OF TEXAS, *et al.*,

Defendants.

§ IN THE DISTRICT COURT OF
§
§
§
§ TRAVIS COUNTY, TEXAS
§
§
§
§ _____ JUDICIAL DISTRICT
§

DECLARATION OF STEVEN SOE

1. My name is Steven Soe. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct. I would testify competently to these facts if called to do so.

2. I am a Plaintiff in this case. I am bringing claims on behalf of myself and as the parent and next friend of my daughter, Samantha Soe, a fifteen-year-old girl about to start tenth grade.¹

3. I am a member of PFLAG, which is also a Plaintiff in this case.

4. I am a Texas resident. I live in Hays County with my wife, Sarah Soe, our daughter Samantha who is 15 years old, and Samantha’s sibling. I work as an educator.

5. Samantha is resilient and confident. She loves choir, theater, geography, music and video games.

6. My wife and I love Samantha and want her to be able to be herself.

¹ Steven Soe, Sarah Soe, and Samantha Soe are all pseudonyms. My daughter (who is a minor), wife, and I are all proceeding pseudonymously to protect our right to privacy and ourselves from discrimination, harassment, and violence, as well as retaliation for seeking to protect our rights.

7. Samantha is transgender. When she was born, her sex was designated as “male” even though she is a girl.

8. When my daughter was around 12 years old, she began to cry at night when she went to bed. One night, she finally broke down and confessed to my wife that she is transgender. I spoke with my daughter and tried to reassure her that there are many ways to be a man, and that one doesn’t have to be into “manly” things to be a man, but my daughter was very clear with me that she was not a man. We never knew or predicted we would have a transgender child.

9. When my daughter came out, my main concern was about protecting her. I worried that she would face hardships growing up as a transgender girl in Texas. But I knew that this was not about me and that I wanted to help to the best of my ability.

10. Looking back, my daughter never fit stereotypical male gender norms. She was always snuggly, sweet, and shy; and as she grew up, she became more talkative and sociable. She was never very interested in monsters or trucks like her male friends. She grew up wearing some of her sister’s hand-me-downs and we never dressed her in exclusively “boy” colors like blue. As she grew up, especially as she neared puberty, she became noticeably more uncomfortable with her body and being treated as a boy.

11. When my daughter first came out to her male friends, they rejected her, and she lost the ability to make girlfriends through soccer due to the sports ban in Texas. School being remote during the COVID-19 pandemic also made it difficult for her to make new friends, but since she has returned to in-person learning, she has found some new friends who accept her as she is. I try to help her make friends through extracurricular activities.

12. After Samantha came out to us, my wife and I started researching how best to

support her mental health. Her mental health is very tied to her physical presentation as a girl, so part of that support included pursuing gender-affirming care. We found her a counselor through a group for LGBTQ+ youth. Samantha now sees a mental health counselor every 1-2 weeks.

13. After my daughter came out, my wife asked Samantha if she was okay discussing her gender identity with her pediatrician at her annual checkup. Samantha gave my wife the okay and at her 2020 checkup, Samantha informed her pediatrician what she was experiencing. A year later, her pediatrician asked her if she was still experiencing gender dysphoria, and when Samantha affirmed that she did and my wife asked her to refer us to a doctor to treat Samantha's gender dysphoria, Samantha's doctor referred us to Dell Children's.

13. After five months we were able to get an appointment at Dell Children's for Samantha with her endocrinologist in October 2021. This first appointment was only a consultation where her endocrinologist apprised us of the potential risks that come with taking puberty blockers and hormones. Samantha received her first Lupron shot two weeks later and in December 2022, Samantha started hormone therapy and began taking estradiol. Samantha has been taking hormone therapy continuously since that time.

14. Before meeting with Samantha's endocrinologist, we conducted our own research and read everything we could about gender dysphoria. We read peer-reviewed medical studies, books and news stories, and we spoke with multiple doctors. By the time of Samantha's first appointment, we had already spent years looking into how best to care for Samantha as a young trans girl.

15. We discussed the risks that our doctor disclosed to us as a family and concluded that the risks of delaying treatment were much more immediate, certain and severe for Samantha than the potential unwanted side-effects posed by beginning gender-affirming care.

16. Since starting hormone therapy, Samantha's mental health has improved significantly. She now speaks much more positively about herself and her body and she is excited to see the feminine changes in herself brought on by gender-affirming care. The prospect of having to stop Samantha's care is shattering. I am terrified that losing access to care would cause her to shut down emotionally and isolate.

17. We fear Samantha will not be safe here in Texas, especially given the anxiety and depression she has felt about potentially losing access to care. Samantha no longer wants to attend college here in Texas, even though in-state tuition would be far less costly.

18. To ensure Samantha receives proper care, my wife and I will need to split the family up, costing us thousands of dollars on out-of-pocket care and travel. To afford this, my wife and I will likely have to delay our retirement a number of years, and there will be an emotional toll on our family that cannot be valued. That said, my wife and I will find a way to make sure that Samantha is able to obtain the care that she needs, whatever the cost.

19. We have been able to rely upon our state employee health care coverage to help pay for our daughter's treatment for gender dysphoria and will lose coverage as a result of SB 14.

20. We are a loving and caring family. The most important thing in the world to us is to safeguard our children's physical and mental well-being. My wife and I are teachers and we raised our children to be kind and intelligent people. We never thought our daughter's medical care would be targeted by politicians or that we would join a lawsuit to protect her care. However, we have to be the best parents we can be for our kids and we have to do everything we can to protect them.

21. My name is [REDACTED]. My date of birth is [REDACTED]. My address is [REDACTED]. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Hays County, State of Texas on Jul 10, 2023.

[REDACTED]

[REDACTED]

Steven Soe

Steven Soe (Jul 10, 2023 12:03 CDT)

Steven Soe