

# Exhibit

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CAUSE NO. \_\_\_\_\_

LAZARO LOE, *et al.*,

*Plaintiffs,*

v.

THE STATE OF TEXAS, *et al.*,

*Defendants.*

§ IN THE DISTRICT COURT OF  
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§  
§ TRAVIS COUNTY, TEXAS  
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§ \_\_\_\_\_ JUDICIAL DISTRICT  
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**DECLARATION OF GINA GOE**

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1. My name is Gina Goe. 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 son, Grayson Goe,<sup>1</sup> who is also a Plaintiff in this Action. We are residents of McLennan County, Texas.

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

4. I work in the healthcare industry for a company in Texas.

5. My son Grayson is 15 years old.

6. Grayson is creative, has a talent for music, and is intelligent. He plays the guitar and the ukulele, and we love to have philosophical discussions together.

7. Grayson is a boy.

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<sup>1</sup> Gina Goe and Grayson Goe are both pseudonyms. My son (who is a minor) and I are both 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.

8. Grayson is transgender. He has a male gender identity but was assigned female when he was born.

9. Grayson told me who he was right before he turned 12 years old. He told me that he had known for a while and had been wanting to tell me.

10. I had watched Grayson struggle for many years with his mental health prior to telling me that he was transgender and that he was a boy. Since he was about nine years old, Grayson has been under the care of a psychologist. I started taking him to a psychologist because he always seemed to be extremely depressed and anxious. Back then, Grayson would spend most of his time in his room, isolated, and only really came out to eat.

11. Grayson's depression and anxiety were so bad that he started engaging in self-harm, which required emergency medical care on at least one occasion. Like any parent who knows their child is hurting, watching him go through that much pain was incredibly difficult for me, and I desperately wanted to help him get better.

12. After Grayson told me that he was transgender, I began to worry about how he would access the health care that he might need. As I work in the healthcare industry, I already had some knowledge about how difficult it can be for transgender people. I was also worried because we live in Texas and there had been previous legislation targeting transgender adolescents. I worried if Grayson and our family would be safe in Texas. I can say for certain though, that despite my worries, it never crossed my mind that I would not support my son in being who he is and getting him the health care that he needs. I love him, unconditionally, and I just want my child to be happy and healthy.

13. I first took Grayson to an adolescent medicine doctor in September 2020. He had previously been under the care of a nurse practitioner as his primary care provider, but I worried

that she would not be receptive to learning that he was transgender. I wanted to do my best to shield Grayson from any negative reactions to his identity.

14. It took Grayson a few visits with his new provider before he felt comfortable enough to tell him that he was transgender and that he needed gender-affirming care. But I was right there by his side at every appointment, supporting him. His new provider was really great about it after Grayson did tell him. Grayson was evaluated for and diagnosed with gender dysphoria.

15. Initially, Grayson was prescribed birth control to stop him from getting a period. At 12, the doctor determined that Grayson had already entered puberty and as such puberty blockers would not be appropriate treatment, but the birth control helped relieve some of his gender dysphoria, as did wearing a binder to make his chest appear flat and dressing in a more masculine way.

16. When Grayson turned 15, I found a provider who could evaluate Grayson for hormone therapy. Although birth control and wearing a binder helped Grayson feel more like himself, he still had gender dysphoria that prevented him from living his life fully. At that point, he had been living and presenting as a boy for over two years.

17. The provider conducted a very thorough review of all the possible effects of going on testosterone. Grayson was informed about the possibility of future infertility and how he might want to consider freezing his eggs before going on testosterone. He was also told about how testosterone would likely lower his voice, might cause him to experience heightened emotions, would cause him to grow facial and body hair, could give him more acne, and would have other effects. Grayson and I both were made aware that many of these changes would likely be permanent. The doctor also required us to provide proof of a gender dysphoria diagnosis. Grayson

assented to the risks and benefits. I also consented to the treatment because I had seen how Grayson had struggled with gender dysphoria and trusted the doctor's ability to provide comprehensive care for my child. We have regular visits with the doctor to monitor Grayson's health now that he is on testosterone.

18. As a parent I have always put the health and safety of my child first, and after doing much research on my own and consulting with Grayson's doctor, I know that getting this care is necessary for Grayson's health. Grayson and I together have made this decision and could not be happier with the results.

19. Since starting testosterone in April 2023, I have witnessed a massive positive shift in Grayson's mental health. He is now much more social, energetic, and spending more time outside of his room. He no longer seems depressed and anxious all the time, has not engaged in self-harm and has not had thoughts of self-harm, which is probably the biggest relief for me. He is happy and healthy because he is receiving the care he needs and that care is allowing him to be and live as his authentic self. Seeing him blossom and the improvement in his mental health has meant everything to me as a mother.

20. Since we learned of S.B. 14, my whole family has been impacted on some level. Should S.B. 14 go into effect, I am extremely worried about what will happen to my son's physical and mental health if his health care is taken away from him. I have seen first-hand how Grayson was prior to receiving treatment and I know this health care is not only saving his life but making his life possible. It has only had positive impacts on Grayson. I just cannot imagine being back in the place we were, where Grayson was suffering so much, experiencing thoughts of self-harm, and engaging in self-harm. But that is exactly what will happen. Grayson does not want to experience those feelings again and I do not want him to. Nor do I want to experience the worry, concern, and

helplessness I felt as his mother, watching him suffer, until we finally figured out what he needed and got it for him.

21. I just want Grayson to remain happy, healthy, and able to envision a future for himself, like he has been since receiving gender-affirming health care.

22. I certainly do not have the financial means to travel back and forth between Texas and a neighboring state where we could get Grayson the care he needs. Our only option would be to move, which is also not something we want, and which would be financially very difficult. I pay out-of-pocket for Grayson's gender-affirming medical care. Texas is where our home is, our community, jobs, family, and friends. It is all Grayson has ever known and he does not want to move, none of us do.

23. S.B.14 threatens the continued mental and physical well-being of my child and ultimately his life. That is just not something I can accept for my child when I know that I, and his providers, have done the best we can, and we have seen the positive impact on Grayson.

24. My legal 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 McLennan County, State of Texas, on Jul 9, 2023.

[REDACTED]

[REDACTED]

*Gina Goe*

Gina Goe (Jul 9, 2023 15:05 CDT)

Gina Goe