

Exhibit D

**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.

DECLARATION OF GEORGE GOE

I, George Goe,¹ pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is George Goe. I offer this Declaration in support of Plaintiffs' Motion for Preliminary Injunction. I am over 18 years old, have personal knowledge of the facts set forth in this Declaration, and would testify competently to those facts if called as a witness.

2. I am a Plaintiff in this action. I am bringing claims on behalf of myself and as the parent and next friend of my son, Gabe Goe. I live in Bethesda, Maryland with my partner and my son, Gabe Goe, who is 14 years old and in eighth grade.

3. Gabe's mother and I are both members of PFLAG.

4. Gabe is a creative and kind teenager. He likes to draw, play video games, and watch anime and other TV shows.

5. Gabe is transgender. He was assigned a female sex at birth, but he is male.

¹ George Goe and Gabe Goe are pseudonyms. My family is proceeding under pseudonym to protect our right to privacy and ourselves from discrimination, harassment, and violence, as well as retaliation for seeking to protect our rights.

6. Looking back on what Gabe was like as a small child, I am not very surprised that he's a boy. He would always gravitate toward toys and activities associated with boys, and his friends tended to be boys. He would wear camouflage, cargo pants, and t-shirts. In his pretend play, Gabe was always boy characters or imaginary creatures. He never liked playing princess or being called a princess. At Disney World as a toddler, a greeter said to him, "Hello, Princess!" Gabe very clearly replied, "I am not a princess!" In my mind, his preferences could have meant something about his gender or sexuality, or it could have meant nothing. But he definitely leaned toward things he considered "boy" things and away from things he considered "girl" things. But there was never any question that we as a family would accept Gabe for who he is no matter what gender identity he had. He is surrounded by a supportive family and community.

7. In July of 2023, when Gabe was 12, he told us that he was transgender. He asked for a short hair cut, and I assumed that was just for convenience at camp. But when he got back, he told his mother that he was transgender. Because Gabe finds it hard to talk about his feelings, his mother let me know that Gabe wanted to be called "Gabe" and use he/him pronouns and be treated like a boy going forward. I was happy for Gabe, because he was happier, and was using his voice to tell us who he was. But I felt a sense of loss initially, which was more about my own experience of being happy as a "girl dad." I also had 12 years of raising a daughter and felt like I was starting over with no experience in raising a son. While it took me a little bit to deal with my initial feelings of loss, it was made a lot easier just seeing how happy and comfortable Gabe had become. Deciding to focus on everything he needed to continue to grow and be healthy was an easy decision.

8. Gabe doesn't like to talk about his feelings, and never really has. He manages a lot of that by himself, and he likes to do his own thinking and research before he comes to me or

another adult for help. So I was not surprised to learn that he had been thinking about his identity as a boy and trying to manage his feelings internally for more than six months before he told us. I also wasn't surprised that he had already picked a new name and a new nickname for himself. As part of his social transition, he also got a more masculine haircut and more masculine clothes. Gabe wanted the image that he projected of himself in the world to match how he saw himself on the inside.

9. Gabe told us during the summer that he was transgender, and so we made sure that his school knew before he came back in the fall for the next school year, in 7th grade. His school was very supportive, and they made sure that everyone knew and used his new name and he/him pronouns. He had the same teachers before and after his social transition, and they have observed that he is more confident, open, and social now than he was before. Because he is comfortable inside himself, he can be more confident outside himself. I also know that he doesn't need to worry during the school day about how he is treated, so he just has normal school day worries, not worries about whether he will be treated differently than other kids.

10. Since Gabe socially transitioned, I have noticed there's been more wisecracking, and more jokes. He is more confident and takes better care of himself. He cares more about how he looks, and he is more intentional about picking out his clothes. Some of that is because he is becoming an older teenager, and also because he is becoming more himself.

11. But I know that how he feels about his physical body is holding him back, and makes it hard to keep up his confidence. Gabe was diagnosed with gender dysphoria in 2023, when he was 13 years old, by his primary care physician.

12. He also experiences a lot of dysphoria around getting his period and his voice. Gabe would always hide getting his period, and completely refused to talk about it. I don't think he even

told us when it first happened, and it was difficult to get him to tell us what he needed in terms of supplies and clothes going forward. We tried to model that there was nothing to be embarrassed about. Even though I didn't grow up with sisters and had to learn about some of this myself, I would talk openly with my partner when she got her period about what was happening and what she needed for hygiene supplies, so that Gabe could see it was nothing to hide and I would get him whatever he needed. But he kept hiding that it was happening. We even tried to work out some kind of signal so he could let us know when he got his period without talking about it, but he still refused. He still finds it very difficult to discuss.

13. In addition to his period, Gabe experiences a lot of dysphoria about his voice. He is very focused on how his voice sounds. We've talked about voice coaching, and he's studied how tone and visual cues can make him sound more like a man. But he's very "in his head" about not being able to talk without being seen as a girl.

14. Gabe has been working with a wide array of doctors to treat his gender dysphoria. In the fall of 2023, when he was 13 years old, his primary care provider referred us to Children's National Hospital ("Children's National") in Washington, D.C. We got in touch with an endocrinologist there, who then put us in touch with a psychologist specializing in transgender health also at Children's National. He has also seen a gynecologist.

15. Gabe starting seeing a psychologist, who had a process for evaluating Gabe over a series of appointments to confirm his gender dysphoria and help us determine what medical steps, if any, would be appropriate for him. Because Gabe wants to look like a boy, and especially to sound like a boy, Gabe was interested in testosterone. But we wanted Gabe to be evaluated and to make sure that this was the right choice for him now.

16. We also took steps to control Gabe's periods because of how severe his dysphoria is. After evaluating Gabe, his doctors explained that he had undergone too much female puberty to start puberty blockers. After talking to his doctors about the risks, benefits, and alternatives to various methods, we decided that we would try an IUD along with medication. Both the IUD and the medication can be either removed or discontinued if Gabe no longer wants them. That has helped some, but it hasn't fully stopped his period. The doctors explained that adding testosterone would help further suppress his periods and treat his dysphoria around menstruating.

17. We also had Gabe talk with an endocrinologist about testosterone. I was part of all those conversations. We talked about what Gabe's options were and about what timelines were appropriate for when he could, or could not, start medications like testosterone. We also talked about what changes were permanent or not, and what choices he might lose or again depending on what medications we decided he should take. For example, we spoke with a fertility specialist about egg preservation before starting testosterone. We learned that Gabe did not need to make any final decisions. Because he had already gone through female puberty, he could harvest eggs later, if he wanted to do that.

18. It was clear from our discussions, especially after talking about the risks, benefits, and alternatives, that testosterone was the right choice for Gabe. It would help suppress his periods in ways that other medications would not; it would make his voice deeper; it would help his body and face shape become more masculine. Gabe also understood what testosterone wouldn't do, like make him taller. He is realistic about what testosterone can and cannot change. We've also talked about doing workouts and lifting weights to try to make his body shape more masculine.

19. These conversations took place over multiple appointments when Gabe was 13 and 14. They involved follow up visits, discussions over risks, benefits, and alternatives. In November

2024, we went for another follow up appointment to extensively go over the risks and benefits with the endocrinologist, who also told us about the blood testing and the letter of support Gabe would need from the psychologist in order to receive testosterone, as well as turning 14. During our November 2024 appointment with the endocrinologist, we scheduled the next appointment with her for March 2025.

20. About two weeks ago, in mid-January 2025 we finalized the changes to Gabe's birth certificate for his name and gender marker. Unfortunately, that did not get changed in time to revise his passport.

21. On January 28, 2025, the White House issued an Executive Order entitled "Protecting Children from Chemical and Surgical Mutilation" ("Executive Order").

22. On January 30, 2025, we reached out to the psychologist at Children's National to ask about what else we needed to do in advance of Gabe's appointment with the endocrinologist in March, when he planned to start testosterone. The psychologist told us she could finish Gabe's evaluation after one more appointment, but, because of the Executive Order, Children's National was no longer issuing new prescriptions or processing refills on existing prescriptions for gender-affirming care for people under 19. Gabe would not be able to start testosterone as planned.

23. Gabe is especially aware of his body and how his voice sounds because other boys in eighth grade are going through puberty and starting to look like high schoolers. He is also focused on not wanting his breasts to grow any bigger. I know that Gabe does not want a period, and does want a deeper voice, along with a more angular face, and more muscle. He is a boy on the inside and wants his body to reflect that.

24. Gabe has been looking forward to this part of his transition. Starting testosterone will allow him to develop as a young man, which is how he sees himself and how he presents

himself to the world, at the same time as his peers. Gabe is especially disappointed, as am I, because he knows that the changes from testosterone take a while to manifest. So the longer he waits, the further behind he will be in terms of looking like a man. It is such a big disappointment that he might not be able to start high school living in the body that matches who he is, or feeling like a young man alongside his peers who are turning into young men. Gabe needs to be able to look and feel like the young man he is, and to get the medical care he needs to treat his gender dysphoria.

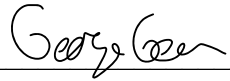
25. I don't want my kid's mental health or physical health to block him from growing up. Gabe also has allergies that result in asthma, and we have worked for years with his doctors to make sure that he has the right medication so that he doesn't get asthma attacks while he's running. Similarly, we also want to work on his gender dysphoria, again, as a family and with his doctors. Gabe would struggle with his asthma if we took his medicine away. And now he's going to be struggling because he cannot get this other medication for his gender dysphoria..

26. Losing access to starting testosterone is especially hard for Gabe because he knows that it is just transgender boys like him who cannot get testosterone; he knows that medication is still available for boys assigned male at birth who are his age. It hurts more that he has been targeted because of who he is to not be able to get this medical care. It feels scarier.

27. Gabe is very private, so he's only going to share his story of being trans with people he trusts. I worry about him, because I want him to feel confident that his body reflects how he sees himself. I know he wants to be able to make his own choices about who he tells he is trans, and I worry that how his voice sounds or how he looks will take that choice away from him.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Dated this 11th day of February 2025.



George Goe