

Exhibit O

**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 JANE DOE 1

I, Jane Doe 1, hereby declare and state and 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 live in the State of Colorado with my husband and two children.
4. One of my children, my son John Doe 1, is almost 15 years old.
5. My family is a member of PFLAG National and our local PFLAG chapter.
6. My son is a smart, kind, well-rounded young man. He has great friendships and excels at the passions he pursues.
7. When my son was born, his sex was assigned as female. He has, from a very early age, told us that he is a boy.
8. Beginning when he was three years old, and certainly by the time he was four, John Doe would give us evidence that he was a boy. He was insistent and persistent that he was a boy.

9. In the middle of kindergarten, John socially transitioned at his school. Over one of the school breaks, we talked to his teacher, and he came back to school by introducing himself to his class as a boy, with a new name and pronouns. He had already preferred dressing and styling his hair in a masculine way and now he did so freely and joyfully. Caring adults in his life would often say to us, “he is clearly more comfortable in his skin now.”

10. When John was 8 years old, we began seeing providers at Denver Health. John Doe had started to show early signs of puberty and was very distressed by the prospect of developing a female body. A provider that saw John diagnosed him with gender dysphoria and recommended a therapist, who John has been seeing since. The more hope he received, the more confident he got. In 3rd grade, he was elected class president.

11. At Denver Health, we also explored with the providers what options we had for John Doe to avoid the distress of endogenous puberty, and to avoid physical changes that did not match his gender. By 5th grade students in Colorado are expected to have the “knowledge and skills necessary to make personal decisions that promote healthy relationships and sexual and reproductive health.” Based on consultation with doctors and our own research and education, and based on John Doe’s strong identity as a boy, we decided that John would receive regular injections of puberty blockers to temporarily pause puberty. John continued receiving injections until he was about 13. Puberty blockers allowed John to continue to live his life as a boy without experiencing distressing changes in his body.

12. As John got older, we continued to discuss with John and his providers what medical care would be appropriate for John’s gender dysphoria. As John approached 12, we discussed testosterone. John wanted to develop as a young man, including facial hair, a deeper

voice, and more muscle mass. It was also not an option for John's health and maturity to remain on puberty blockers indefinitely.

13. Because John is a boy, and has always known himself to be a boy, going through an endogenous female puberty was not an option for him. After discussing the risks and benefits with his providers, and making sure John understood what the effects of testosterone would be, John began testosterone after turning 12 years old.

14. John has been doing so well on testosterone. He has a robust social life, activities, and is very engaged in school. He likes being on testosterone because it makes him more masculine, and that is just who he is. His biggest concern is about being outed. He does not tell his friends that he is trans. In his words, he "doesn't ever remember being a girl."

15. After the election, John's providers at Denver Health told us that they would be there for my son, and not to worry.

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

17. After that Executive Order, John's provider called us to say that, because of the Executive Order, Denver Health was no longer taking patients and would be ending the provision of gender affirming medical care to those under 19 by the end of February. We will need to find my son a new Primary Care Provider and need continuing appointments to check his hormone levels and a doctor to prescribe testosterone.


18. My son has always known he is a boy, and has been living his life as a boy since he was 5 years old. He has never undergone endogenous female puberty. We changed his name and gender marker on his birth certificate to reflect his male identity. It would be unthinkable, and

horrifying, for him to be unable to access the medical care that he needs to continue living and developing as a young man until he is 19.

19. I am so scared and devastated. I have been in tears since the announcement. My son has been seeing his Doctor at Denver Health for years. We know and trust his Doctor and the providers at Denver Health. I do not know how we will find care for our son going forward.

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

Dated this 3rd day of February 2025.


Jane Doe