

Exhibit G

**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 ROBERT ROE

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

1. My name is Robert Roe. I am a Plaintiff in this action. I offer this Declaration in support of Plaintiffs’ Motion for Preliminary Injunction. I 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 sixteen years old.

3. I live in Massachusetts with my mom Rachel Roe, my dad, and my siblings.

4. My family belongs to PFLAG.

5. I am transgender. My sex assigned at birth was female, but I am male.

6. For as long as I can remember, I have identified as a boy. When I was a little kid, I got a journal full of fill-in-the blank prompts. One of the prompts said, “When I grow up, I want

¹ Robert Roe and Rachel Roe 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.

to be a _____.” I think you were supposed to write “firefighter” or something like that. Instead I wrote in the blank spot, “A boy.”

7. When I was in maybe first grade, my elementary school had swim lessons, and before each lesson the boys lined up on one side of the pool and the girls lined up on the other side. It was obvious to me that I should line up with the boys, so I did. It never occurred to me to line up with the girls. My teachers were confused when they called attendance and saw me in the boys’ line, not the girls’ line, but I knew I was in the right place. I also swam in shorts, not a bathing suit, and with no shirt on. I never liked wearing girls’ clothing, especially dresses. When I was five or six years old, my grandmom made me wear a dress for a party. I wore it backwards, so that the bow wasn’t on my front. Later, I put on a pair of my brother’s pants and tucked it, so it just looked like a regular shirt, and I took off the girly dress shoes and put on a pair of my brother’s shoes instead. In school, I would refuse to use the girls’ bathroom. I would hold it, or if I had time, run to the single restrooms at the front of the school. If I couldn’t hold it or make it, I would go to the boys’ restroom.

8. I started at a new school for third grade, which is when I began going by “Robert” and using male pronouns at school. Since then, I have introduced myself as Robert and as a boy.

9. When I was about nine, I started seeing doctors at GeMS at Boston Children’s Hospital. I have been going there regularly since then. My pediatrician diagnosed me with gender dysphoria and the doctors at GeMS confirmed the diagnosis. During my first few appointments at GeMS, the doctors asked me a lot of questions about how I felt about using the girls’ bathroom (not good), wearing a dress at my wedding (definitely not), and other questions about how I wanted to live my life (as a boy). They would mark my answers on a scale from a girl unicorn to a boy unicorn, and all my answers fell on the boy unicorn side. At first, I saw an endocrinologist there

every six months, and a psychologist every six months as well. Eventually, they told me I only needed to see a psychologist once a year, because I was doing well living as myself. But at all those appointments, I was asked if I still felt like a boy and wanted to continue living as a boy. I always did, and still do.

10. I received a puberty blocker at GeMS when I was 11 years old. I had been talking about puberty blockers with my doctors at GeMS, as well as my parents, for several years at that point. The doctors at GeMS explained to me in great detail what a puberty blocker was and showed me charts explaining the puberty I would experience if I did not get a puberty blocker. I knew I did not want any part of that puberty and that I did not want to start looking like a girl. To get the puberty blocking implant, I needed anesthesia. I remember waking up, eating a popsicle, and thinking that I was so happy that I did not have to be a girl.

11. I will never forget the exact date I started testosterone when I was 14 years old, about two years ago (in 2023). That day was really special to me. Before I started hormone therapy, the doctors at GeMS had many conversations with me about the pros and cons of starting testosterone. They told me that I would likely grow facial hair, develop a deeper voice, and get taller, although I probably will not ever be six feet tall. Those were all things I wanted. They also described risks, like going bald, but most of the risks were things that I wanted (like facial hair) or things that sounded better than going through female puberty. I also wanted to start the changes of male puberty, since other boys in my class were also starting to stop looking like little kids. I had long conversations with my doctors at GeMS and with my parents about the effect hormone therapy would have on my ability to have biological children. The doctors told me that if I wanted to have biological children, I would have to go through female puberty. I told them that I understood and that I still wanted to proceed with hormone therapy. My mom repeatedly asked

me, as did the doctors, if I wanted to be pregnant when I was older, and the answer for me is definitely not. I want to be a dad, and I am excited to have a family in other ways. I am adopted, so I know that families do not have to be biologically related. I also knew that if I did not start hormone therapy, I would start to look like a girl, and I knew that I still did not want to be a girl.

12. I started feeling the effects of hormone therapy during my freshman year of high school, particularly regarding my voice. When I heard my voice recorded, I noticed that it was getting deeper and deeper. I was so enthusiastic about that. It felt like an amazing improvement from the way I used to sound. I felt more included, and it felt more me. Every day, I get to be and sound more like myself. Having a deeper voice feels normal to me. I also love having facial hair, which I do not plan to shave.

13. I have a pretty busy life. Most days I wake up at 4 or 5 am so that I can go to the gym and shower before school. I go to school, and a lot of the time I then have practice for sports. After practice, I sometimes go back to the gym again. I have a close group of friends who have played sports with me since we were all in middle school. Some of my friends have little siblings, and they run up to me in the neighborhood, or want to hang out when I'm at their house. I bought one of them a Spider-Man toy for Christmas last year. I go to church every Sunday with my family, where I help run the audio-visual for the Zoom feed. I also used to volunteer at the Sunday school, since I love kids. The church has asked me if I'd be willing to come back and work with the younger kids instead of doing the A/V feed. One night a week, I volunteer with our church to serve dinner to people who are homeless, and I participate in our church's youth group. I am excited about our church's upcoming trip to the beach. I also help take care of our family dogs.

14. Since I started testosterone two years ago, I have regular follow-up appointments with my endocrinologist at GeMS. At first, the appointments were every three months, to make

sure that I was comfortable with the changes that were happening, and to run blood tests to see if I was ready to increase the dose. At first the dose was very small, but it has been going up a little bit at a time. Now, I go every six months to see if I need to increase my dosage of testosterone or if it should stay the same. I have not had unwanted side effects from the testosterone.

15. I administer my own injection every Sunday. My mom used to do it, but I eventually became comfortable enough to do it myself.

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

17. One of my regular appointments at GeMS was scheduled for January 29, 2025. That appointment was supposed to be a routine check-up, where they would do my bloodwork and decide whether my dosage of testosterone needed to change. I expected that the dose might go up, depending on what the labs said, and that I would get another prescription. I have refills, but only for maybe a few months. Not enough for a whole year, and definitely not three years. And I need to keep getting blood work done to know when it’s time to increase my dose.

18. But the morning of January 29, GeMs called my mom and told her that they had to cancel the appointment because of the Executive Order, and that GeMS was canceling all of its appointments for people under age 19 who need gender affirming medical care.

19. When my mom told me that GeMS had canceled my appointment because of the Executive Order, I felt numb. If I had to stop my hormone therapy, I would start female puberty and would start to look like a girl. That is not how I feel, and I have never had to live life with my body looking or feeling like someone I am not. It would undo all of the good things that my medical care has done for me. I feel like I would have to start my life over. When I think about losing the physical effects of testosterone, I feel like so many of the things that are good in my life are going

to be taken away from me. I want my voice to get deeper, and to keep growing more facial hair. Even though the changes from testosterone have been just a little bit at a time for the past two years, I know that I am on the right path, and I keep feeling better in my body. If I stopped feeling that way, I would not be comfortable working out, or playing sports, or just hanging out with my friends. Some of my closest friends know I am trans, but most people in my life or who I meet now do not. It is important to me that I have the choice about who know I am trans. If my body changed and I started looking like a woman, I would lose that choice. I would stop being me.

20. Before the election, my mom talked to me about what might happen to my medical care. She told me there was a chance that something like the Executive Order could happen. I know that my mom will do everything she can to make sure I can get the medical care I need.

21. I have dreams for my future. I think I might want to become a coach, since I love sports and playing sports, and I love working with kids. I think kids like me because I accept them for who they are, and I think I would be a good dad one day.

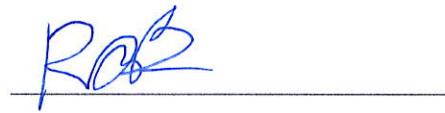
22. I hope this Executive Order is stopped so that I can continue to take testosterone and be myself. It is also important to me to keep seeing doctors at GeMS. I have been going there since I was 9, and had all the conversations with them about myself, how I know I am a guy, and why I want to keep taking testosterone and never go through female puberty. If the Executive Order is not stopped, I will need to find another doctor, and start that process all over again. I also want to continue taking testosterone. I like the changes I've seen with male puberty, and I want to continue growing and looking more like an adult man. This is who I am, losing this would mean losing myself.

23. My mom has told me she is willing to travel to find this care, but I do not want me or her to have to do that. I know it will be expensive for my family, and I do not want to miss

school, or practice, or my time at our church because we have to travel from Massachusetts for care, even maybe out of the country. I always trusted that Massachusetts was one of the best and safest places for kids like me to get care. People travel here to get care because it is safe. But I am scared that even my home state, Massachusetts, isn't safe anymore.

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

Dated this 12th day of February 2025.



Robert Roe