

# **Exhibit P**

**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 2**

I, Jane Doe 2, 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 Illinois with my two children.
4. One of my children, my son John Doe 2, is 17 years old.
5. My family is a member of PFLAG.
6. My son is a thoughtful, loving, artistic young man. He is tender toward our family cats and still loves to spend time with me and his sister.
7. When my son was born, his sex was assigned as female. That is not who he is, though – he has shown us from a very early age that he is a boy.
8. Just before seventh grade, John told us that he was transgender. That was not a surprise to us. He has always clearly seen himself as more masculine and always wanted other people to see him that way, too. We did our best to make sure his school environment was safe

and supportive. John had already been dressing and presenting himself as a boy, so we continued to support him with that, as well as using male pronouns and a new name.

9. After John had socially transitioned for a year, we got his legal name and gender marker changed on his birth certificate and other vital documents. We wanted to make sure that his deadname and sex assigned at birth did not out him against his will as transgender in high school and his adult life. We wanted to make sure that he could grow into an adult and be exactly who he is.

10. John was also very uncomfortable in a female body. We took a slow and steady approach to all of his care. We found an LGBTQ+ affirming primary care practice and had multiple long conversations with the providers about what options were available. John was also diagnosed with gender dysphoria. He has been seeing a therapist for almost five years.

11. Because of John's severe gender dysphoria, especially related to his body going through puberty, we decided, in consultation with John's doctors, John, and as a family, that he would start receiving puberty blocking injections. John was very distressed about getting a period or growing breasts. Although I had concerns about the potential risks of blockers, I recognized that John going through a female puberty would be devastating. I became comfortable with the potential risks given the alternative of watching John suffer immensely as his body changed, and especially knowing that blockers were temporary and could be stopped later.

12. John felt completely relieved once puberty blockers paused the development of female puberty. I could see how relieved he was, and how much better he could participate in life without suffering through the worry and anxiety.

13. We also discussed, at great length, whether John would start testosterone. Remaining on puberty blockers indefinitely was not an option as John got older, and neither was

going through female puberty. Again, after discussing the risks and benefits with John's providers, as a family, and with John, we decided that John should start testosterone when he was 14 years old, about a year after he started blockers.

14. Once John started testosterone, he was so excited. He wanted a deeper voice, and to grow a beard and body hair. We marveled with delight when his voice started to drop, even a little bit, and his mustache started to grow in. At first, John was a little disappointed that the changes weren't happening faster. I explained that puberty was a gradual process for everyone, including other boys, and that the changes would take time.

15. Now that John has been on testosterone for about three years, he's growing into the young man he is supposed to be. The one aspect of his body that is still holding him back is his chest.

16. Like with John's name and change marker changes, I want him to be able to start his adult life looking and feeling like the person he knows himself to be. As a family, we began discussing John's options for chest masculinization surgery, which would allow him to stop wearing a binder, to swim, and to feel at home in his body.

17. We received a referral to UI Health for surgery. It was very difficult to get into UI Health because of waiting list times. We put substantial effort into getting that appointment, as well as all the letters of support from providers that John needed.

18. John had a surgical consult for surgery at UI Health in October, shortly before the election. He was initially scheduled for surgery at the end of March of this year. After the election, he was offered a surgery date at the end of January, which we took.

19. Throughout January, we continued to take steps toward surgery, including pre-op consulting with his primary provider and the surgeon.

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

21. After the Executive Order, I reached out to the surgeon, expressing concern that they would cancel my son’s surgery.

22. On Wednesday, January 29, 2025, the surgeon called to tell me that, because the hospital was worried about losing millions of dollars in funding, the hospital would not allow them to proceed with my son’s surgery later that month.

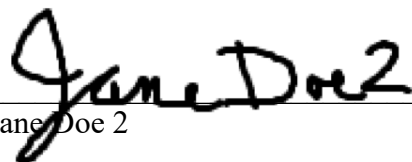
23. It was an awful few days in our house. My son was devastated, and I had to watch my son carefully to make sure he wouldn’t hurt himself in despair.

24. My son is a good man. He creates beautiful art expressing his feelings about his gender, and what it would mean for him to feel at home in his body. I cannot imagine how he will suffer if he is unable to have surgery until more than a year after he is already a legal adult.

25. As his mother, I only want what is best for my son. At every step of his journey, I have thought to myself, “what will this decision mean in ten years?” The medical care that my son has received so far has allowed him to live his life and become who he knows himself to be, who he is supposed to be. On my deathbed, if I am thinking about what kind of parent I have been, I know that supporting my son on his journey was the right thing.

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

Dated this 3<sup>rd</sup> day of February 2025.

  
Jane Doe 2