

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
Nashville Division**

L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, et al.,

Plaintiffs,

v.

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General and Reporter, et al.,

Defendants.

Civil No. 3:23-cv-00376

**DECLARATION OF RYAN ROE IN SUPPORT OF
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

I, RYAN ROE, pursuant to 28 U.S.C §1746, declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration and could and would testify competently to those facts if called as a witness.

2. I live in Tennessee with my mom and dad.

3. I am fifteen years old and a freshman in high school.

4. I am transgender. I was designated female on my birth certificate but my gender identity is male. I am a boy. Gender-affirming health care saved my life and the idea of losing it terrifies me.

5. Being transgender is a core part of who I am but it is not the only part of who I am. I love coffee and exploring different cafes. I have an amazing community of friends in Tennessee and enjoy hanging out with my friends when I am not studying. My favorite subjects in school are math and science. I am interested in politics and hope to someday be a lawyer.

6. From a young age, I understood that something was different about me but I couldn't quite figure out how to articulate what I felt inside. I remember once around first grade, we were doing a mini- "marathon" around our school and I was racing with all the boys. One of the boys told me that I wouldn't win because I was a girl. I thought in response: "What do you mean I am a girl?" I was upset they didn't think I could win, but I was more upset about being called a girl. It didn't feel right.

7. During those early years of elementary school, I wanted to be able to use the boys' restroom. The restroom was gross, but it felt right for me because it was for boys.

8. Around that time, I told my best friend that I thought I was a boy. It was nice to confide in someone but I didn't feel like I could tell anyone else.

9. Each year I would get more and more anxious about puberty coming. Before puberty, it felt like there wasn't that much of a difference between boys and girls and I could manage existing in the middle. But with puberty coming, I was afraid of my body changing in feminine ways and of having a period. It caused me a lot of stress to think about. I didn't know what being transgender was but I remember looking up whether women could grow beards. I was hoping at least I could become a woman with a beard.

10. By the time I was in fifth grade, I had started puberty and my body was changing in ways that caused me a lot of stress. I tried to manage my distress through what I wore and how I presented myself. I wore baggy clothes and boxers. I shopped in the boys' section at stores and cut my hair. I remember after I cut my hair, a server said, "Thank you, Sir," to me at a café after I left a tip. It made me feel really happy and it felt right.

11. Expressing my gender through changes in my hair and clothes did affect how I was perceived by other people, and that helped a little. But my body still caused me a lot of anxiety

and I always worried that my voice would out me as transgender to other people or cause them to mis-gender me. I considered going mute to protect myself from the pain and anxiety that my voice caused.

12. In fifth grade I also got my period. When I got my first period, I had a panic attack. It was awful and everything felt wrong about living in my body.

13. It was right around this time that I told my parents that I am transgender. I first told my mom and then my dad. My mom was concerned about discrimination I would face in the world and was just uncertain about what being transgender would mean for me.

14. My mom connected me with a therapist at my pediatrician's office so that I would have mental health support for everything that I was going through.

15. I felt like no matter what I tried my anxiety and depression were getting worse. I reached the point where I would throw-up before school every morning because I was so anxious.

16. When I was in sixth grade, I started to come out to a few other close people in my life. While I wasn't open yet to everyone about being transgender, kids at school started to find out and they would bully me. In seventh grade, I had an amazing science teacher who made me feel safe to come out to more people. I decided that year to fully come out to the whole school. I thought maybe if I was out to more of the staff they could help me manage the bullying. Unfortunately, that didn't really happen and the bullying continued.

17. In middle school I legally changed my name so that all of the teachers would call me by a name that matched who I am.

18. Although I was presenting as a boy in and out of school, I was still uncomfortable with my body and my voice. My voice in particular caused me serious distress, and I stopped talking in public a lot of the time. I was a good student, but I never wanted to participate in class

because hearing my voice caused me a lot of anxiety. It felt like nothing was helping. I had been in therapy since I was in fifth grade and I still felt so much anxiety and depression.

19. In the summer after seventh grade, my therapist at the time diagnosed me with gender dysphoria. Soon after that I went to Vanderbilt to meet with doctors there about treatment. We had a long visit with Dr. Brady at Vanderbilt. After running some tests and conducting an evaluation, Dr. Brady said I was too old for puberty blockers. At the time I was thirteen and Dr. Brady wanted to wait a little longer before starting me on hormone therapy. I had to review a bunch of paperwork with my parents after the first appointment. I did get medication to stop my period at that first visit, but it took a while for it to work.

20. It felt hard to keep waiting for any changes to my body but I was relieved to have at least met with a doctor about medical treatment. Dr. Brady sent us home with information about testosterone and I read everything about it. My family and I talked about what testosterone treatment would be like and I explained how important it was for me to have my body align with my male gender.

21. My mom and dad and I went through all of the paperwork from Dr. Brady and talked about each potential side effect and any questions we had. We went back to see Dr. Brady when I was in eighth grade, in January of 2022. That is when I got my first shot of testosterone. That day changed my life. I was never afraid of needles but if I had been, my fear would have dissolved instantaneously at the amount of relief and joy that I felt.

22. Beginning my medical transition gave me hope and a positive outlook on the world that I had lost.

23. As I have continued treatment, I have found my voice again – in every way. Before treatment, I hid. Now, I like to see myself in the mirror and in photos. I am raising my hand in

class again and participating in all aspects of school. I feel stronger – physically, mentally and emotionally. I feel so happy with myself and that makes me feel like I can do and be more.

24. When politicians in Tennessee started to debate this bill that would take away my health care, that hopefulness and confidence began to fade. Hopelessness crept in again.

25. If I lose my care, I am so scared my mental health will plummet. I know how bad it was before and I don't want to go back to that place. And knowing how amazing I feel now, it would probably be even worse to have it all ripped away. If I lost my testosterone and I couldn't get it back, I really don't know how I would survive. It would feel impossible.

26. Since the bill passed, my family and I have had a lot of hard conversations. We have to talk about regularly traveling out of state to get me care, or even moving away from our home. I feel terrible when I think about what that would mean, not just for me, but for my parents, too. I feel like in a sense I am losing my childhood because I have to spend so much time worrying and planning.

27. All of my friends and my family and my therapist are here in Tennessee. It is the only home I have ever known and I don't want to have to leave to get the care I need.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: April 17, 2023



RYAN ROE