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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

SEXUALITY AND GENDER ALLIANCE,

Plaintiff,

v.

DEBBIE CRITCHFIELD, et al.,

Defendants.

Case No. 1:23-cv-00315-DCN

SUPPLEMENTAL DECLARATION OF JANE DOE

I, Jane Doe, hereby declare as follows:

1. I have personal knowledge of the facts set forth in this supplemental declaration. I have made this declaration using a pseudonym.

2. Until recently, I did not make a request for accommodation citing S.B. 1100 with Boise High School, as I had previously been granted permission, through conversations with my mom and a school counselor, to use the nurse's office and single-user restrooms.

3. On November 7, 2025, I submitted a request for accommodation citing S.B. 1100 through my attorneys. After meeting again with the counselor, the school confirmed that I have access to the existing single-user facilities on campus. I am unaware of other accommodations the school could provide me.

4. I have seen teachers who I assume to be cisgender use the single-occupancy restrooms. I am not sure if cisgender students have access. The students who I have generally seen using the single-user restrooms are transgender students.

5. I use the single-user restrooms at Boise High School. I often have to wait to use the single-user restroom. I generally try to use the restroom in the main gym and I estimate that it is occupied about 1/4th of the time I try to use it. I generally go during class so I have not been late to class as a result, but going during a passing period could make me late, and I do miss more class time or lunch time when I have to go to the separate building and also when I have to wait for the restroom. I have also forgotten my card at home and have had to find a teacher to open the restroom for me before I could use it.

6. I have two classes in the Frank Church building, which also houses the cafeteria and library. I also have three classes on the top floor of the main building, which does not have a single-user restroom on that floor.

7. To use the single-user restroom in the main gym building, a student must have their key card coded to allow entry. I was given access to that restroom after completing a process with the school counselor and my parents.

8. As I reported in my previous declaration, using the single-occupancy restrooms has caused me distress. It is scary having to look around before to see if anyone will see me going into the single-user restroom, as I worry about people gossiping and speculating about me being transgender. I have heard students refer to the single restroom in the main gym building as the "trans bathroom." I don't want people to know I am transgender without my consent—even students who might be friendly. For me, it is not a part of myself I talk about or that I feel is the most important part of my identity. There are times I have started to go toward the restroom and then have abandoned my plans because I see people around. I also worry that it looks strange when I have to dig my key card out of my bag or put on my coat before I leave class to go to the restroom, as other students don't need a card or to leave the building to go. I find being forced to use a separate restroom ostracizing, and I feel like I'm being treated like this other kind of thing.

9. I have not used multi-occupancy restrooms that do not align with my gender identity this year. As I previously stated, in past years, when I was early in my transition at my previous school, I had to use the boys' room on rare occasions when I could not avoid it. I would wait for what felt like forever until I was sure that no one was around. Even then, it was scary and it made me feel dysphoric. At this point in my transition, as my gender expression is increasingly feminine, it would be dangerous and scary for me to use the boys' room.

10. I do not know for certain whether my use of the single-user restroom has yet disclosed my status and to whom, as I suspect that disclosure of my status would occur through rumors and I may not be immediately aware when it occurs. However, I fear that use of the single-user restroom has increased either the knowledge or suspicion of me being transgender against my wishes. I have heard students refer to the single-user restroom in the main gym building as the "trans bathroom." There are students who sometimes do their homework in the

hallway next to that bathroom, and they sometimes stare at me as I go in. One time when I had forgotten my key card, one of them offered to open the door for me because they said they had a card from a transgender friend.

* * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20 day of November, 2025. Jane Doe

Jane Doe