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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

DECLARATION OF JANE DOE

I, Jane Doe, hereby declare as follows:

1. I offer this declaration in support of Plaintiff's motion for preliminary injunction. 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. I have used a pseudonym to protect my identity.

2. I am a 16-year-old girl. I attend Boise High School and will be in eleventh grade during the 2025-26 academic year. I am also a member of the Sexuality and Gender Alliance (SAGA) at Boise High School. SAGA is a student organization focused on supporting, uplifting, and representing lesbian, gay, bisexual, transgender, and queer students at Boise High School.

3. I was born in Boise and have lived here my entire life with my parents. I have an older brother who is now in college and similarly attended Boise School District. My mom also works as a public school teacher in the Boise area.

4. I enjoy writing, including poetry in particular, video games, and computer science. I have thought about majoring in college in data science or psychology, which is another subject that I find interesting. I am also good at math (although I don't necessarily love it).

5. I am transgender. I came to better understand myself, and my female gender identity, around the summer between eighth and ninth grade. This was also around the time when puberty started and I was giving more thought to who I am. I gradually tried expressing myself in more feminine ways, including, for instance, by wearing ribbons in my hair, and I found that doing so made me feel better. I knew that the process of transitioning to live openly as a girl would not be easy to do; but I also knew that living as myself would be worth it.

6. I was worried about coming out to my parents. But, during ninth grade, I felt comfortable enough to take that step, and I was relieved to find that they were supportive of me.

My brother has also been supportive of me as well.

7. I switched junior high schools within Boise School District between eighth and ninth grade. That gave me the opportunity to have a fresh start with peers.

8. As part of my transition, I began using a female-typical first name. My parents completed a form with Boise High School so that this name is reflected in my school records, and I have legally changed my name. I also currently have long hair.

9. Other students at Boise High School have been generally respectful of my gender and use female pronouns for me.

10. My state identification, the Idaho Star Card, reflects my female gender identity.

11. I have also received gender-affirming hormone therapy, which has made my appearance more feminine. That medical care, along with living as female and being treated as female, has helped to reduce the distress from the disconnect between my female gender identity and the male sex I was assigned at birth. It's hard to describe how that distress feels to someone who hasn't experienced it, but I've sometimes compared it to how it might feel if you saw spiders crawling all over your body.

12. I want to be able to use the girls' restroom at school like other girls. During ninth grade in junior high, when I was early in my transition, I would try to avoid using the restroom at school altogether. I would generally use the restroom before school, not go the restroom for the entire school day, and then use the restroom again after school when I got home. I trained myself to "hold it," although I am also on a medication with the side effect that it makes me need to go to the restroom more often. On the rare occasion when I had no choice but to use the restroom at school, I used the boys' restroom—and it was a terrible experience. I waited for what felt like forever until I was sure that no one was around so that I could enter the restroom

without anyone seeing me. It was scary, and using the boys' restroom also made me feel dysphoric.

13. During tenth grade at Boise High School, I would sometimes use a gender-neutral restroom on campus, which included the nurse's restroom and the family restroom in one building that required a specially coded ID for access. Having to always rely on these facilities can make me late for class because they are further away, however, and it also marks me as transgender, which can feel alienating, like I'm an outsider. While I am transgender, I don't view it as the defining feature of who I am as a person. I just want to fit in. It is upsetting to think that I may have to go through the rest of high school without access to something as basic as the ability to use the same restroom as everyone else. I am also concerned about losing control over my private information about being transgender, as a result of not being treated the same as other girls.

14. Particularly 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' restroom. It is not an option for me. I worry that I would experience harassment at a minimum, and possibly worse. I think boys would not feel comfortable sharing the restroom with someone who lives as a girl, and it would be surprising and disruptive for them if a transgender girl were to use the boys' restroom.

15. All of the multi-user restrooms at Boise High School have individual stalls to my knowledge. If I had access to the girls' restroom, I would naturally use an individual stall as well. Whenever I use any public restroom, I get in and get out as quickly as possible. I would also never expose myself to others while using a restroom (which would worsen the distress of gender dysphoria); I would take care of my private business in the stall and leave. And because other girls in the restroom similarly use stalls, I would not be exposed to their bodies either.

* * *

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 1st day of July, 2025.

Jane Doe

Jane Doe