

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ALINA BOYDEN and
SHANNON ANDREWS,

Plaintiffs,

Case No. 17-cv-264

v.

STATE OF WISCONSIN DEPARTMENT
OF EMPLOYEE TRUST FUNDS, et al.,

Defendants.

DECLARATION OF STEPHANIE BUDGE, PH.D.

I, Stephanie Budge, Ph.D., hereby declare under penalty of perjury:

1. I have personal knowledge of the matters stated in this declaration, as well as of those stated in my report and supplemental reports. All of the matters in this declaration are primarily based on my knowledge of the peer-reviewed research, including my own, regarding the psychological outcomes related to gender dysphoria and the treatments for gender dysphoria. I may further supplement my opinions in response to information produced by Defendants in discovery and in response to additional information from Defendants' experts.

2. I have been retained by counsel for the Plaintiffs as an expert in the above-captioned lawsuit to provide an expert opinion. I have been asked to provide an opinion on how thorough Dr. Mayer was in providing evidence for his opinions.

3. As can be seen from my report and supplemental reports, Dr. Mayer relied on sources that were outdated or that excluded key studies. Dr. Mayer has published only two non-peer reviewed publications focusing on transgender individuals (in *The New Atlantis*). When discussing medical interventions for individuals diagnosed with gender dysphoria, Dr. Mayer relies heavily on the Birmingham University report in the 2016 *New Atlantis* article. In my second supplemental report on page 2, I noted criticisms of the Birmingham University report—namely that a substantial body of literature has been published since 2004, which was when the last Birmingham University report was released on this topic. Relying primarily on a report that was published 14 years prior to when Mayer provided his opinions for this case does not allow for a comprehensive view of the literature. My second supplemental report provides examples of studies that have been conducted recently that demonstrate rigorous research design (using longitudinal [also known as cohort] studies and control groups), see page 2.

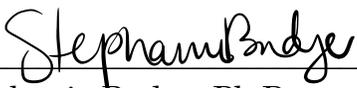
4. Dr. Mayer does not cite one study within the text of his expert report that focuses on research outcomes of medical interventions for gender dysphoria, thus I can only rely on his *New Atlantis* (2016) publication to determine the evidence he uses for his opinions. In Mayer's *New Atlantis* 2016 article, the most recent publication cited in the "Therapeutic Interventions in Adults" section was published at least 7 years prior to Dr. Mayer's expert report (see Dhejne et al., 2011). In my supplemental report on page 9, I discuss the Dhejne et al., 2011 study to note how their findings actually demonstrated a reduced risk in suicidal ideation for the

patients in the study. It is notable that Dr. Mayer's only publication focusing on medical interventions for gender dysphoria was published in 2016, and yet he only cites four studies—all of which were published prior to 2011. As can be seen from the studies cited in my reports, a substantial body of literature has been published on this topic since 2011.

5. Given the lack of focus on studies that have been published recently, it is my opinion that Dr. Mayer only focused on certain parts of studies that supported his point of view and excluded numerous other studies that did not support his point of view.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of September 2018.



Stephanie Budge, Ph.D.