

EXHIBIT 5

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISIVLLE DIVISION

Electronically filed

DOE 1, *et al.*
Plaintiffs

v.

THORNBURY, *et al.*
Defendants

and

COMMONWEALTH OF KENTUCKY,
ex rel. ATTORNEY GENERAL DANIEL
CAMERON
Intervening Defendant

Civil Action No. 3:23-CV-00230-DJH

DECLARATION JAMES M. CANTOR, PhD

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I. Credentials and Qualifications

A. Education and professional background

1. I am a sexual behavior scientist, with an internationally recognized record studying the development of human sexualities, and an expert in research methodology of sexuality. My curriculum vitae is attached as Appendix 1 to this report. My publication record includes both biological and non-biological influences on sexuality, ranging from pre-natal brain development, through adulthood, to senescence. The primary, but not exclusive, focus of my own research studies has been the development of atypical sexualities. In addition to the studies I myself have conducted, I am regularly consulted to evaluate the research methods, analyses, and proposals from sexual behavior scientists throughout the world. The methodologies I am qualified to assess span the neurochemical and neuroanatomic level, individual behavioral level, and social and interpersonal levels.

2. I am trained as a clinical psychologist and neuroscientist, and I am the author of over 50 peer-reviewed articles in my field, spanning the development of sexual orientation, gender identity, hypersexuality, and atypical sexualities collectively referred to as *paraphilias*. Although I have studied many atypical sexualities, the most impactful of my work has been MRI and other biological studies of the origins of pedophilia. That work has revolutionized several aspects of the sex offender field, both with regard to the treatment of offenders and to the prevention of sexual abuse of children. In 2022, I received the Distinguished Contribution Award from the Association for the Treatment and Prevention of Sexual Abuse in recognition of my research and its integration into public policy. My efforts in this regard have been the subject of several documentary films.

3. Over my academic career, my posts have included Senior Scientist and Psychologist

at the Centre for Addiction and Mental Health (CAMH), and Head of Research for CAMH's Sexual Behaviour Clinic. I was on the Faculty of Medicine of the University of Toronto for 15 years and have served as Editor-in-Chief of the peer reviewed journal, *Sexual Abuse*. That journal is one of the top-impact, peer-reviewed journals in sexual behavior science and is the official journal of the Association for the Treatment and Prevention of Sexual Abuse. In that appointment, I was charged to be the final arbiter for impartially deciding which contributions from other scientists in my field merited publication. I believe that appointment indicates not only my extensive experience evaluating scientific claims and methods, but also the faith put in me by the other scientists in my field. I have also served on the Editorial Boards of *The Journal of Sex Research*, the *Archives of Sexual Behavior*, and *Journal of Sexual Aggression*. I am currently the Director of the Toronto Sexuality Centre in Canada. Thus, although I cannot speak for other scientists, I regularly interact with and am routinely exposed to the views and opinions of most of the scientists active in our field today, within the United States and throughout the world.

4. For my education and training, I received my Bachelor of Science degree from Rensselaer Polytechnic Institute, where I studied mathematics, physics, and computer science. I received my Master of Arts degree in psychology from Boston University, where I studied neuropsychology. I earned my doctoral degree in psychology from McGill University, which included successfully defending my doctoral dissertation studying the effects of psychiatric medication and neurochemical changes on sexual behavior, and included a clinical internship assessing and treating people with a wide range of sexual and gender identity issues.

5. I have a decades-long, international, and award-winning history of advocacy for destigmatizing people with atypical sexualities. While still a trainee in psychology, I founded the

American Psychological Association's (APA) Committee for Lesbian, Gay, and Bisexual Graduate Students. Subsequently, I have served as the Chair for the Committee on Science Issues for APA's Division for the Psychology of Sexual Orientation and Gender Diversity and was appointed to its Task Force on Transgender Issues. Throughout my career, my writings and public statements have consistently supported rights for transgender populations and the application of science to help policy-makers best meet their diverse needs. Because my professional background also includes neurobiological research on the development of other atypical sexualities, I have become recognized as an international leader also in the destigmatizing of the broader range of human sexuality patterns.

6. I am highly experienced in the application of sex research to forensic proceedings: I have served as the Head of Research for the Law and Mental Health Program of the University of Toronto's psychiatric teaching hospital, the Centre for Addiction and Mental Health, where I was appointed to the Faculty of Medicine.

7. I have served as an expert witness in 21 cases in the past four years, as listed on my *curriculum vitae*. These cases included criminal, civil, and custody proceedings, preliminary injunction and Frye hearings, as well as trials. I have testified in courts in Canada and throughout the U.S., including Alabama, Arizona, Florida, Illinois, Indiana, Kansas, Kentucky, Massachusetts, New York, Texas, Utah, and West Virginia. I have provided expert testimony concerning the nature and origins of atypical sexualities, as well as concerning gender dysphoria and gender identity in children.

8. For my work in this case, I am being compensated at the hourly rate of \$400 per hour. My compensation does not change based on the conclusions and opinions that I provide here or later in this case or on the outcome of this lawsuit.

B. Clinical expertise vs. scientific expertise

9. In clinical science, there are two kinds of expertise: Clinicians' expertise regards applying general principles to the care of an individual patient and the unique features of that case. A scientist's expertise is the reverse, accumulating information about many individual cases and identifying the generalizable principles that may be applied to all cases. Thus, different types of decisions may require different kinds of experts, such that questions about whether a specific patient represents an exception to the general rule might be better posed to a physician's expertise, whereas questions about establishing the general rules themselves might be better posed to a scientist's.

10. In legal matters, the most familiar situation pertains to whether a given clinician correctly employed relevant clinical standards. Often, it is other clinicians who practice in that field who will be best equipped to speak to that question. When it is the clinical standards that are themselves in question, however, it is the experts in the assessment of scientific studies who are the relevant experts.

C. The professional standard to evaluate treatment models is to rely on objective assessors, not treatment model users in a conflict of interest with its results.

11. I describe in a later section the well-recognized procedures for conducting reviews of literature in medical and scientific fields to evaluate the strength of evidence for particular procedures or treatments. Importantly, the standard procedure is for such evaluations to be conducted by objective assessors with expertise in the science of assessment, and not by those with an investment in the procedure being assessed. Because the people engaged in providing clinical services are necessarily in a conflict of interest when claiming that their services are effective, formal evaluations of evidence are routinely conducted by those *without* direct

professional involvement and thus without financial or other personal interest in whether services are deemed to be safe or effective. This routine practice standard is exemplified by all of the only three systematic, comprehensive research reviews that have been conducted concerning the safety and efficacy of puberty blockers and cross-sex hormones as treatments for gender dysphoria in children.

12. In 2020, England’s National Health Service (NHS) commissioned a major review of the use of puberty blockers and cross-sex hormones in children and young people and appointed prominent pediatrician Dr. Hilary Cass to lead that review, explicating that “Given the increasingly evident polarization among clinical professionals, Dr. Cass was asked to chair the group as a senior clinician with *no prior involvement* or fixed views in this area.” (Cass 2022 at 35, italics added.) Dr. Cass’s committee in turn commissioned formal systematic reviews of evidence from the England National Institute for Health & Care Excellence (NICE), a government entity of England’s Department of Health and Social Care, established to provide guidance to health care policy, such as by conducting systematic reviews of clinical research, but without direct involvement in providing treatment to gender dysphoric individuals. (<https://www.nice.org.uk/>.) Similarly, the Finnish health care council commissioned its systematic review to an external firm, Summaryx Oy. (Pasternack 2019.) Summaryx Oy is a “social enterprise” (a Finnish organization analogous to a non-profit think-tank) that conducts systematic research reviews and other analyses for supporting that nation’s medical and social systems. Its reviews are conducted by assessment professionals, not by clinicians providing services. (www.summaryx.eu/en/.) The systematic review by Sweden’s National Board of Health and Welfare (NBHW) included four experts. (SBU Scoping Review 2019.) In addition to their own research fields, they provided clinical services in areas adjacent to but apart from gender

dysphoric children, such as physical disorders of sexual development (Dr. Berit Kriström) or gender dysphoria in adults (Dr. Mikael Landén).

13. My own most-cited peer-reviewed paper relating to gender dysphoria in minors illustrates the expertise in the evaluation of scientific evidence that I have and am recognized for. That is, that paper provided not clinical advice or a clinical study, but rather a review and interpretation of the available evidence concerning desistance in children who suffer from gender dysphoria, as well as of evidence (and lack of evidence) concerning the safety and efficacy of medical transition to treat gender dysphoria in minors. (Cantor 2019.)

14. My extensive background in the assessment of sexuality research and in the development of human sexuality places me in exactly the position of objectivity and freedom from conflict-of-interest required by the universal standards of medical research science.

15. I do not offer opinions about the best public policy. Multiple jurisdictions have attempted multiple different means of implementing that science into various public policies. Although I accept as an axiom that good public policy must be consistent with the scientific evidence, science cannot objectively assess societal values and priorities. Therefore, my opinions summarize and assess the science on which public policy is based, but I can offer no opinion regarding which public policy mechanisms would be best in light of that science.

II. Multiple international health care systems that had initially expanded medicalized transition to include minors have reversed that policy, as research on safety and effectiveness accumulated, in a growing international trend against the medicalized transition of minors.

16. Medicalized interventions for minors originated in European clinics (most prominently in the Netherlands and Sweden), and these precedents (and in particular the so-called “Dutch Protocol”) are frequently cited by American clinicians. However, growing concerns about safety together with the continuing absence of reliable evidence of benefit even after more than 20 years of experience have led respected and far-from “conservative” European health care ministries to step back and discourage or even cease providing medicalized transition of minors, other than in exceptional and carefully limited circumstances, such as within registered and approved research trials. Instead, these authorities now endorse psychotherapy as the treatment of choice for minors, with medical interventions representing a method of last resort, if permitted at all. These range from medical advisories to outright bans on the medical transition of minors. I provide details concerning these policy changes below, and provide additional details regarding the underlying systematic reviews in Sections V and VI below.

A. England

17. The National Health Service (NHS) of the United Kingdom centralized gender counselling and transitioning services into a single clinic, the Gender Identity Development Service (GIDS) of the Tavistock and Portman NHS Foundation Trust. Between 2008 and 2018, the number of referrals to the clinic had increased by a factor of 40, leading to a government inquiry into the causes. (Rayner 2018.) The GIDS was repeatedly accused of approving and endorsing medical transition in minors without adequate justification, including by 35 members of the GIDS own staff, who resigned by 2019. (BBC News 2021; Donnelly 2019). An ex-governor and psychotherapist of the Trust who resigned, Marcus Evans, said staff feared being

called transphobic, which was impacting their objectivity in their work. (Doward 2019).

18. In 2020, a former patient of the GIDS, Keira Bell, brought a lawsuit alleging that the GIDS practices with respect to prescribing puberty blockers for minors were unproven and potentially harmful in ways that meant that it was impossible for minors to give meaningful informed consent. After taking extensive expert evidence, the trial court concluded that puberty blockers might have “potentially irreversible” and “life-changing” effects on a young person (*Bell v. Tavistock*, [2020] EWHC 3274 (Admin), ¶148, 151), that there was “very limited evidence as to its efficacy” (¶134) such that “it is right to call the treatment experimental” (¶148), and that use of puberty blockers almost always led to use of cross-sex hormones that “may well lead to a loss of fertility” (¶¶ 137-138). While an appeals court later concluded that the trial court had exceeded the proper role of the court in making factual findings on these questions, the appeals court acknowledged that “Medical opinion is far from unanimous about the wisdom of embarking on treatment before adulthood. The question raises not only clinical medical issues but also moral and ethical issues, all of which are the subject of intense professional and public debate.” (*Bell v. Tavistock* 2021 at ¶3.)

19. Perhaps prompted by the Keira Bell litigation, also in 2020 the English National Health Service (“NHS”) commissioned the thorough independent review of the use of puberty blockers and cross-sex hormones to be chaired by Dr. Cass that I have described above. After an extensive process that included obtaining the systematic reviews of all published studies bearing on safety or efficacy of these hormonal interventions in minors as well as “extensive” listening sessions with clinicians, patients, and families, in February 2022 Dr. Cass issued an extensive “Interim Report” summarizing the state of the relevant medical science and in particular highlighting the presence of serious but unstudied risks, and the lack of strong evidence of

efficacy. I will quote specific items from Dr. Cass’s Report as relevant to specific topics below. At a high level, Dr. Cass concluded that to date there has been “very limited research on the sexual, cognitive, or broader developmental outcomes” from the use of puberty blockers for gender dysphoria (Cass 2022 at 19), that it is an unanswered question “whether the evidence for the use and safety of [puberty blockers] is strong enough as judged by reasonable clinical standards” (at 37), and that “the available evidence was not strong enough to form the basis of a policy position” with regard to use of both puberty blockers and cross-sex hormones in minors (at 35).

20. Following issuance of Dr. Cass’s Interim Report, the English NHS has published a consultation document concerning a proposed revised service specification under which “NHS England will only commission [puberty blockers] in the context of a formal research protocol.” (NHS Interim Service Specification at 12.)

B. Finland

21. In Finland, minors were made eligible for medicalized transition in 2011 by that country’s health care service, the Council for Choices in Health Care in Finland (COHERE). Assessments of mental health and preparedness were centralized by law into two research clinics, Helsinki University Central Hospital and Tampere University Hospital.

22. In 2019, the Service Selection Council (Palko) of the Finnish Ministry of Social Affairs and Health commissioned a systematic review of the effectiveness and safety of medicalized transition (Pasternack 2019), and in 2020, Finnish researchers published an analysis of the outcomes of adolescents diagnosed with transsexualism and receiving cross-sex hormone treatment in Finland’s Tampere University Hospital. (Kaltiala 2020.) Despite the purpose of medical transition being to improve mental health, the study showed:

Medical gender reassignment is not enough to improve functioning and relieve psychiatric comorbidities among adolescents with gender dysphoria. Appropriate interventions are warranted for psychiatric comorbidities and problems in adolescent development. (Kaltiala 2020 at 213.)

They concluded that the youth who were functioning well after transition were those who were already functioning well before transition, and those who were functioning poorly before transition continued to function poorly after transition.

23. Importantly, the results of this study exemplify why correlations reported from surveys cannot be interpreted as evidence of causality. Mental health assessment would exclude the most poorly functioning youth from among those permitted to transition, but transition itself did not improve the functioning of those who were permitted to transition.

24. Consistent with the results of the independent evidence review by Summaryx Oy and analysis of the ethical issues involved, Finland’s health care service ended the surgical transition of minors, ruling in 2020 that “Surgical treatments are not part of the treatment methods for dysphoria caused by gender-related conflicts in minors.” (COHERE Summary 2020.) The review of the research concluded that “[N]o conclusions can be drawn on the stability of gender identity during the period of disorder caused by a psychiatric illness with symptoms that hamper development.” (COHERE Summary 2020.) COHERE also greatly restricted access to puberty-blocking and cross-sex hormonal treatments, explicating that they may be considered for minors “only if it can be ascertained that their identity as the other sex is of a permanent nature and causes severe dysphoria,” and only “if the need for it continues *after* [any] other psychiatric symptoms have *ceased* and adolescent development is progressing normally.” (COHERE Summary 2020, italics added.) They restricted the procedures to their centralized research clinics. The council was explicit in noting the lack of research needed for decision-making, “There is also a need for more information on the disadvantages of procedures and on people

who regret them.” (COHERE Summary 2020.) In light of the special developmental and ethical considerations surrounding minors, COHERE recommended that “no decisions should be made that can permanently alter a still-maturing minor’s mental and physical development.”

(COHERE Recommendation 2020 at 7.)

C. Sweden

25. Sweden’s national health care policy regarding trans issues has developed quite similarly to that of the UK. Already in place 20 years ago, Swedish health care policy permitted otherwise eligible minors to receive puberty-blockers beginning at age 14 and cross-sex hormones at age 16. At that time, only small numbers of minors sought medical transition services. An explosion of referrals ensued in 2013–2014. Sweden’s Board of Health and Welfare (“Socialstyrelsen”) reported that, in 2018, the number of diagnoses of gender dysphoria was 15 times higher than 2008 among girls ages 13–17. (Swedish Socialstyrelsen Support 2022 at 15.)

26. Sweden has long been very accepting with regard to sexual and gender diversity. In 2018, a law was proposed to lower the age of eligibility for surgical care from age 18 to 15, remove the requirement for parental consent, and lower the legal age for change of gender to age 12. A series of cases of regret and suicide following medical transition were reported in the Swedish media. (Orange 2020.) In 2019, the Swedish Agency for Health Technology Assessment and Assessment of Social Services (SBU) therefore initiated its own systematic review of the research. The SBU released English-language results first as a summary and then published as a peer reviewed article. (Ludvigsson et al., 2023.) Like the UK, the Swedish investigation employed standardized review methods to ensure the encapsulation of all the relevant evidence and came to the same conclusions: “This systematic review of almost 10,000 screened abstracts suggests that long-term effects of hormone therapy on psychosocial and

somatic health are unknown, except that GnRHa treatment seems to delay bone maturation and gain in bone mineral density.” (Ludvigsson 2023 at 12.) They emphasized, “The absence of long-term studies is worrying because many individuals start treatment as minors (<18 years) and CSHT is lifelong.” (Ludvigsson 2023 at 10.) Regarding the full set of studies, “No randomised controlled trials were found, but we could identify 24 relevant observational studies. However, these were limited by methodological weaknesses, for instance lack of or inappropriate control group, lack of intra-individual analyses, high attrition rates that precluded conclusion to be drawn.” (Ludvigsson 2023 at 9–10.)

27. In 2021, the leading Swedish pediatric gender clinic, at the Karolinska Institute, issued a new policy statement in which it stated that the Swedish evidence review “showed a lack of evidence for both the long-term consequences of the treatments, and the reasons for the large influx of patients in recent years.” (Karolinska 2021.) The Karolinska Institute further stated that “These treatments are potentially fraught with extensive and irreversible adverse consequences such as cardiovascular disease, osteoporosis, infertility, increased cancer risk, and thrombosis.” In a dramatic reversal of its policy, the Institute announced that “In light of the above, and based on the precautionary principle, which should always be applied, it has been decided that hormonal treatments (i.e., puberty blocking and cross-sex hormones) will not be initiated in gender dysphoric patients under the age of 16.” Further, the Karolinska clinic announced that patients ages 16–18 would receive such treatments *only* within research settings (clinical trials monitored by the appropriate Swedish research ethics board). (Karolinska 2021.)

28. In 2022, the Swedish National Board of Health and Welfare published a major new national policy document concerning “Support, investigation and hormone therapy in gender incongruence in children and youth,” including an English-language summary. (Swedish

Socialstyrelsen Support 2022.) The National Board of Health noted “the continued lack of reliable scientific evidence concerning the efficacy and the safety of both [puberty blockers and cross-sex hormones],” and concluded (based on the commissioned evidence reviews) that “the evidence on treatment efficacy and safety is still insufficient and inconclusive for all reported outcomes. Further, it is not possible to determine how common it is for adolescents who undergo gender-affirming treatment to later change their perception of their gender identity or interrupt an ongoing treatment.” As a result, the Board of Health concluded that, “[f]or adolescents with gender incongruence, the . . . risks of puberty suppressing treatment with GnRH-analogues and gender-affirming hormonal treatment currently outweigh the possible benefits.” (Swedish Socialstyrelsen Support 2022 at 10-12.) Accordingly, the Swedish Board of Health and Welfare “recommends restraint when it comes to hormone treatment.” (Swedish Socialstyrelsen Updated Recommendations 2/22/22.)

D. France

29. While medical authorities in France have not issued any actual restriction, in 2022, the Académie Nationale de Médecine of France issued a strongly worded statement, citing the Swedish ban on hormone treatments:

[A] great medical caution must be taken in children and adolescents, given the vulnerability, particularly psychological, of this population and the many undesirable effects, and even serious complications, that some of the available therapies can cause...such as impact on growth, bone fragility, risk of sterility, emotional and intellectual consequences and, for girls, symptoms reminiscent of menopause.” (Académie Nationale de Médecine 2022.)

For hormones, the Académie concluded “the greatest reserve is required in their use,” and for surgical treatments, “[T]heir irreversible nature must be emphasized.” The Académie warned “the risk of over-diagnosis is real, as shown by the increasing number of transgender young adults wishing to ‘detransition’.” Rather than medical interventions, it advised health care

providers “to extend as much as possible the psychological support phase.” The Académie reviewed and emphasized the evidence indicating the very large and very sudden increase in youth requesting medical transition. It attributed the change, not to society now being more accepting of sexual diversity, but to social media, “underlining the addictive character of excessive consultation of social networks which is both harmful to the psychological development of young people and responsible, for a very important part, of the growing sense of gender incongruence.” (Académie Nationale de Médecine 2022.)

E. Norway

30. In 2022, Norway’s Healthcare Investigation Board (Ukom) began a review of that country’s guidelines for the medicalized transition of minors. (Block, Norway’s Guidance, 2023.) In 2023, it released its report, which concluded that the evidence for the use of puberty blockers and cross-sex hormone treatments in youth was insufficient, and acknowledged the international recognition of the dearth of evidence of safety and effectiveness. The report deemed medicalized transition to be experimental. (Ukom 2023, Summary and Section 11.) The report faulted the existing Norwegian guidelines, published in 2020, for concentrating on “equality and rights” while “deviating from the requirements for the development of knowledge-based guidelines.” (Ukom 2023, Summary.)

31. The Norwegian report concluded that “The knowledge base, especially research-based knowledge for gender-affirming treatment (hormonal and surgical), is insufficient and the long-term effects are little known” and that “This applies particularly to the teenage population, which accounts for a large part of the increase in referrals to the specialist health service in the last decade.” (Ukom 2023, Summary and Section 7.)

32. In an interview about the report with the *British Medical Journal*, the Ukom Medical

Director, Stine Marit Moen, said, “We’re concerned that there may be undertreatment, overtreatment, and the wrong treatment” and added:

We’ve seen a marked increase in referrals to specialised healthcare services in Norway for teenagers, as seen in many other western countries, and nobody knows the reason. The stability of the gender dysphoria of these teenagers is not known, and the evidence of long term effects of gender affirming treatments for this young population is insufficient. (Block, Norway’s Guidance, 2023.)

33. Ukom noted that referrals to its national treatment service increased by a factor of eight between 2007 and 2018, and that this increase was largely from young biological females. Seventy-five percent of the referrals to its National Treatment Service had other co-morbid psychiatric diagnoses, including not only depression and anxiety but also autism spectrum disorders, ADHD, and Tourette’s Syndrome. (Ukom 2023, Summary and Section 7.)

F. Assertions by U.S. organizations and officials that there is ‘no debate’ over medicalized transition are false.

34. The international consensus is clearly demonstrated by the multiple recent analyses, statements, and policy decisions from the health care service systems around the world. These include England’s National Health Service, which noted the “Scarce and inconclusive evidence to support clinical decision making [which] has led to a lack of clinical consensus on what the best model of care for children and young people experiencing gender incongruence and dysphoria should be.” (NHS 2022 at 5.)

35. As these several recent national policy reviews, statements, and recommendations make very clear, there is a great deal of doubt and debate among the sophisticated international medical and mental health community as to whether the administration of puberty blockers and cross-sex hormones to children and young people is the best clinical practice, and as to whether these treatments have been shown to be safe and effective. Indeed, the lack of scientifically reliable data concerning safety and efficacy highlighted by the systematic evidence reviews

commissioned by the English National Health Service, by the Swedish National Board of Health and Welfare, and by the Finnish Council for Choices in Health Care in Finland have caused those national health authorities and others to move sharply away from approving puberty blockers, cross-sex hormones, or surgery for minors.

36. In this report, I explain the evidence and lack of evidence behind that doubt, that debate, and the emerging international consensus of caution reflected in the several recent European policy statements or changes.

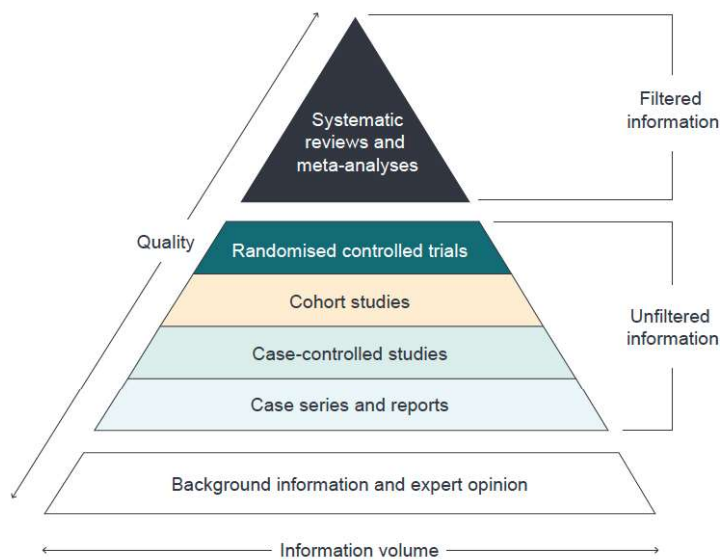
III. Clinical research has a standard *Pyramid of Evidence* that summarizes the relative strength of potential sources of information.

37. The widely accepted starting point in evidence-based medicine is the recognition that clinical experiences and recollections of individual practitioners (often called “expert opinion” or “clinical anecdote”) do not and cannot provide a reliable, scientific basis for treatment decisions. Rather, in evidence-based medicine, clinical decision-making is based on objectively demonstrated evidence of outcomes from the treatment options. An essential first step in evidence-based medicine is identifying the relevant findings from among the immense flood of clinical journal articles published each year. Those studies and the evidence they report are then assessed according to the strength offered by the research methods used in each study. The research methods used in a study determine its reliability and generalizability, meaning the confidence one may have that using the same treatment again will have the same result again on other people. In this section, I explain the well-accepted criteria for evaluating the evidentiary value of clinical studies.

A. Clinical research comprises a standard *Pyramid of Evidence*, wherein studies from higher levels of evidence outrank even more numerous studies from lower levels of research.

38. The accepted hierarchy of reliability for assessing clinical outcomes research is routinely represented as a “Pyramid of Evidence” (Figure 1). Scientific questions are not resolved by the number of studies coming to one versus another conclusion. Studies representing higher levels of evidence outrank studies from lower levels. Even large numbers of lower-level studies cannot overcome a study representing a higher level of evidence. Indeed, because lower-level studies are generally faster and less expensive to conduct, it is typical for them to outnumber higher level studies. This is the property meant to be reflected by the pyramid’s shape, which is larger at the base and smaller at the apex.

Figure 1: Pyramid of Standards of Evidence



Source: OpenMD. Retrieved from <https://openmd.com/guide/levels-of-evidence>.

B. The highest level of evidence for safety and effectiveness research is the systematic review of clinical experiments.

39. The most reliable and conclusive method of determining what is actually known or not known with respect to a particular treatment is the *systematic review*. Systematic reviews employ standardized procedures to assess comprehensively all available evidence on an issue, minimizing opportunities for bias in gathering and evaluating research evidence. As described by Dr. Gordon Guyatt, the internationally recognized pioneer in medical research who invented the term *evidence-based medicine*, “A fundamental principle to the hierarchy of evidence [is] that optimal clinical decision making requires systematic summaries of the best available evidence.” (Guyatt 2015 at xxvi.)

1. Systematic reviews prevent the ‘cherry-picking’ of studies that favor a particular result.

40. Because systematic reviews are designed to prevent researchers from including only the studies they favor and other biases, systematic reviews are the routine starting point for

developing clinical practice guidelines. (Moher 2009.) The methods of a systematic review include:

- Define the scope, including the “PICO”: Population/Patient, Intervention, Comparison/Control, and Outcome(s);
- Select and disclose the keywords used to search the (massive) available clinical research database(s) for potentially relevant articles, identify the databases they were applied to, and the date(s) of the searches, including any subsequent updates;
- Select and disclose the inclusion/exclusion criteria to be used to filter the “hits” from the keyword searches to identify research studies to be included in the detailed review;
- Review abstracts to select the final set of studies, using at least two independent reviewers to allow for measuring inter-rater reliability on the criteria;
- Code each study’s results impacting the research question(s), disclosing the list of all studies and the results coded from each;
- Evaluate the reliability of the results [risk of bias] of each included study, applying uniform criteria across them all.

41. As detailed in Section V, several systematic reviews have been conducted of the outcomes of medicalized transition of gender in minors. Their conclusions are highly consistent with each other. Much of the expert testimony offered by plaintiffs’ experts, however, depends on levels of evidence far lower on the pyramid of evidence (e.g., “expert opinion”) or beneath the pyramid entirely (e.g., survey studies) while ignoring the thorough, high-quality systematic reviews available in the research literature. Doing so is in direct conflict with foundational principles of evidence-based medicine.

2. Systematic reviews prevent biased assessment of individual studies by uniformly applying standard criteria to each study reviewed. The most widely used criteria set is “GRADE.”

42. In order to produce unbiased assessment of the studies within the systematic review, all the studies must be evaluated using the same evaluation criteria. Without such criteria, assessments can become influenced by researchers who, intentionally or not, hold the evaluative bar higher or lower for studies according to whether the studies’ conclusions support or

challenge that researcher’s perspective. Several such systems have been developed. The most widely used system is the “Grading of Recommendations, Assessment, Development and Evaluations” (GRADE). (Goldet & Howick 2013.) In the GRADE system, studies’ findings are downgraded for:

- Risk of bias:¹
 - Lack of clearly randomized allocation sequence,
 - Lack of blinding,
 - Lack of allocation concealment,
 - Failure to adhere to intention-to-treat analysis,
 - Trial is cut short,
 - Large losses to follow-up;
- Inconsistency;
- Indirectness of evidence;
- Imprecision; and
- Publication bias (when studies with ‘negative’ findings remain unpublished).

Studies’ ratings are upgraded if their findings identify:

- A large effect of the treatment;
- A dose-response relationship (the size of the effect has a systematic association with the dose of the treatment given); or
- That all plausible biases only *reduce* the apparent effect of the treatment (necessarily making the estimated effect sizes conservative estimates).

43. GRADE assessments yield a four-point score representing the certainty that a

reported treatment effect is true. These certainty scores are (GRADE Handbook, Section 5):

<u>Certainty</u>	<u>Meaning</u>
High	We are very confident that the true effect lies close to that of the estimate of the effect.
Moderate	We are moderately confident in the effect estimate: The true effect is likely to be close to the estimate of the effect, but there is a possibility that it is substantially different.
Low	Our confidence in the effect estimate is limited: The true effect may be substantially different from the estimate of the effect.

¹ In science, including in the GRADE system, the term “bias” refers to any external influence leading to a systematic over- or underreporting of the outcome being measured. That is, in this context “bias” is not used in the sociopolitical sense of personal values.

Very Low We have very little confidence in the effect estimate: The true effect is likely to be substantially different from the estimate of effect.

C. The highest level experimental study of clinical safety and effectiveness is the Randomized Controlled Trial (RCT). RCTs can demonstrate that a given treatment causes (and not merely correlates with) a given outcome.

44. Randomized Controlled Trials are the gold standard method of assessing the effects caused by an experimental treatment. The great scientific weight of RCTs follows from the randomization: People do not pick which research group they are in—a treatment group or a control group. Without random group assignment, it is not possible to identify which, if any, changes are due to the treatment itself or to the factors that led to who did and did not receive treatment.

45. Levels of evidence lower than RCTs are unable to distinguish when changes are caused by the experimental treatment, or by factors that can mimic treatment effects, such as ‘regression to the mean’ and the placebo effect.

46. In the absence of evidence that X causes Y, it is a scientific error to use language indicating there is causal relationship. In the absence of evidence of causality, it is scientifically unsupportable to describe a correlation with terms such as: increases, improves, benefits, elevates, leads to, alters, influences, results in, is effective for, causes, changes, contributes to, leads to, yields, impacts, decreases, harms, and depresses. Scientifically valid terms for correlations include: relates to, is associated with, predicts, and varies with.

47. I note that the plaintiffs’ experts repeatedly misrepresent studies using causal language to describe studies that are unable to demonstrate causality. Such language incorrectly asserts that the evidence is stronger than it actually is.

1. RCTs, but not lower levels of evidence, overcome biases such as ‘regression to the mean’ and other factors that can mimic clinical improvement.

48. ‘Regression to the mean’ arises when researching issues, such as mood, depression, or levels of emotional distress that typically fluctuate over time. People are more likely to seek out treatment during low points rather than high points in their emotional lives. Thus, when tracking emotional states over time, the average of a group of people in a treatment group may often show an increase; however, without an untreated control group to which to compare them, researchers cannot know whether the group average would have increased anyway, with only the passage of time.

49. Blinding or masking participants in an RCT from which group they are in has been described as a preferred strategy since the 1950s, in order to exclude the possibility that a person’s expectations of change caused any changes observed (the “placebo effect”). In practice, however, it has often made little or no significant difference. For example, a study using very high quality methods—meta-analysis of meta-analysis research—has revealed no statistical difference in the sizes of the effects detected by blinded/placebo-controlled studies from non-blinded/non-placebo-controlled studies of depression. (Moustgaard 2019.) That is, the pre-/post-treatment differences found in placebo groups are not as attributable to participants’ expectations of improvement as they are to expectable regression to the mean. (Hengartner 2020.)

2. When a ‘no treatment control group’ is untenable, RCTs use an ‘active comparator’ group instead.

50. It is not always possible to compare a group receiving a treatment to a group receiving only an inactive procedure, such as a placebo treatment or no treatment at all. In such situations, the standard, ethical, clinical research method is to compare two active treatments with each other.

51. The systematic reviews from England explicitly called for ‘active comparator’ studies to test whether medicalized transition of minors shows mental health benefits superior to those obtained from psychotherapy. (NICE 2020a at 40; NICE 2020b at 47.) Risk:benefit analysis cannot justify the greater risks associated with medicalization without evidence of correspondingly greater benefit.

D. Cohort studies are the highest level of evidence about medicalized transition currently available.

52. The highest-level study of medicalized transition of minors conducted thus far are cohort studies: gathering a sample of individuals who chose to undergo treatment and tracking them over time. Cohort studies are able to answer some questions that lower-level studies cannot, such as whether a high-functioning group improved over time versus having been composed of people who were already high-functioning. Cohort studies are, however, unable to demonstrate causality, to identify how much of any change was due to regression to the mean, or to detect any placebo effects.

E. Expert opinion represents the least reliable evidence.

53. As Figure 1 illustrates, in evidence-based medicine, opinion based on clinical experience is identified as the *least* reliable source of medical knowledge. Among other reasons, this is because non-systematic recollections of unstructured clinical experiences with self-selected clientele in an uncontrolled setting is the most subject to bias. Indeed, mere “clinical experience” was long the basis of most medical and mental health clinical decisions, and it was precisely the scientific and clinical inadequacy of this type of “knowledge” that led to the development and widespread acceptance of the importance of evidence-based medicine. As Dr. Guyatt has written, “EBM places the unsystematic observations of individual clinicians lowest on the hierarchy,” both because EBM “requires awareness of the best available evidence,” and

because “clinicians fall prey to muddled clinical reasoning and to neglect or misunderstanding of research findings.” (Guyatt 2015 at 10, 15.)

F. Surveys and cross-sectional studies cannot demonstrate treatment effectiveness.

54. Surveys represent observational research rather than experimental research. (In science, experiments are studies involving a manipulation, not merely observation, by the researcher.) Surveys and cross-sectional studies can provide only correlational data and cannot demonstrate causality. (See Section IV below.) It is not possible for a survey to yield evidence that a treatment is effective. No number of surveys can test a treatment, advancing it from ‘experimental’ to ‘established’ status.

55. Survey studies do not even appear on the *pyramid of evidence*. In accordance with the routine standards, systematic reviews of treatment studies exclude surveys.

56. I note that the plaintiffs’ experts’ reports rely largely on survey studies.

IV. Methodological defects limit or negate the evidentiary value of many studies of treatments for gender dysphoria in minors.

A. In science, to be valid, a claim must be objective, testable, and falsifiable.

57. In behavioral science, people's self-reports do not represent objective evidence. It is when emotional and other pressures are strongest that the distinction between and need for objective over subjective evidence is greatest. Surveys do not represent objective evidence. This is especially true of non-random surveys and polls, recruited through online social networks of the like-minded.

B. Correlation does not imply causation.

58. Studies representing lower levels of evidence are often used because they are faster and less expensive than studies representing higher levels. A disadvantage, however, is that they are often limited to identifying which features are *associated* with which other features, but they cannot show which ones are *causing* which. It is a standard property of statistical science that when a study reports a correlation, there are necessarily three possible explanations. Assuming the correlation actually exists (rather than represents a statistical fluke or bias), it is possible that X causes Y, that Y causes X, or that there is some other variable, Z, that causes both X and Y. (More than one of these can be true at the same time.) To be complete, a research analysis of a correlation must explore all three possibilities.

59. For example, assuming a correlation between treatment of gender dysphoria in minors and mental health actually exists (rather than is a fluke): (1) It is *possible* that treatment causes improvement in mental health. (2) Yet, it is also possible that having good mental health is (part of) what enabled transition to occur in the first place. That is, because of gate-keeping procedures in the clinical studies, those with the poorest mental health are typically not permitted to transition, causing the higher mental health scores to be sorted into the transitioned group.

(See Section IV.E on *Selection Bias*.) (3) It is also possible that a third factor, such as wealth or socioeconomic status, causes both the higher likelihood of transitioning (by being better able to afford it) and the likelihood of mental health (such as by avoiding the stresses of poverty or affording psychotherapy).

60. This principle of scientific evidence is why surveys do not (cannot) represent evidence of treatment effectiveness: Surveys are limited to correlations. (See Section III.F. on *Surveys*.)

C. When two or more treatments are provided at the same time, one cannot know which treatment caused observed changes (i.e., ‘confounding’).

61. Confounding is a well-known issue in clinical research design. As detailed in the present report, it applies throughout treatment studies of gender dysphoria. Patients who undergo medical transition procedures in research clinics routinely undergo mental health treatment (psychotherapy) at the same time. Without explicit procedures to distinguish them, it cannot be known which treatment produced which outcome (or in what proportions). Indeed, that mental health improvement came from mental health treatment is a more parsimonious (and therefore, scientifically superior) conclusion than is medicalized treatment causing mental health improvement.

D. Extrapolation to dissimilar populations and dissimilar conditions.

62. The purpose of clinical science is to establish from a finite sample of study participants information about the effectiveness and safety, or other variables, of a treatment that can be generalized to other people. Such extrapolation is only scientifically justified with populations matched on all relevant variables. The identification of those variables can itself be a complicated question, but when an experimental sample differs from another group on variables already known to be related, extrapolation cannot be assumed but must be demonstrated directly

and explicitly.

63. Each of the systematic reviews from the UK, Sweden, and Finland emphasized that the recently observed, greatly increased numbers of youth coming to clinical attention are a population different in important respects from the subjects of often-cited research studies. Conclusions from studies of adult-onset gender dysphoria and from childhood-onset gender dysphoria cannot be assumed to apply to the current patient populations of adolescent-onset gender dysphoria. The Cass Report correctly advised:

It is also important to note that any data that are available do not relate to the current predominant cohort of later-presenting birth-registered female teenagers. This is because the rapid increase in this subgroup only began from around 2014-15. Since young people may not reach a settled gender expression until their mid-20s, it is too early to assess the longer-term outcomes of this group. (Cass 2022 at 36.)

The report also indicated:

[I]t is important that it is not assumed that outcomes for, and side effects in, children treated for precocious puberty will necessarily be the same in children or young people with gender dysphoria. (Cass 2022 at 63.)

64. Finland's review repeated the observation of greatly (20 times) increased numbers, an entirely different demographic of cases, and increased proportions of psychiatric co-morbidities. (Finnish Palko Preparation Memo at 4-6.) The Swedish review highlighted "the uncertainty that follows from the yet unexplained increase in the number of care seekers, an increase particularly large among adolescents registered as females at birth." (Swedish Socialstyrelsen Support 2022 at 11.)

65. It is well known that males and females differ dramatically in the incidence of many mental health conditions and in their responses to treatments for mental health conditions. Thus, research from male-to-female transitioners (the predominant population until recent years) cannot be extrapolated to female-to-male transitioners (the predominant population presenting at

clinics today). Outcomes from patients who experienced clear pre-pubertal childhood gender dysphoria cannot be extrapolated to patients who first manifest diagnosable gender dysphoria well into puberty. Outcomes from clinics employing rigorous and openly reported gate-keeping procedures cannot be extrapolated to clinics or clinicians employing only minimal or perfunctory assessments without external review. Developmental trajectories and outcomes from before the social media era cannot be assumed to apply to those of the current era or the future. Research from youth with formal diagnoses and attending clinics cannot be extrapolated to self-identifying youth and those responding to surveys advertised on social media sites.

66. Further, treatment of gender dysphoria in children and adolescents presents novel-use cases very dissimilar to the contexts in which puberty blockers and cross-sex hormones have previously been studied. Whereas use of puberty blockers to treat precocious puberty *avoids* the medical risks caused by undergoing puberty growth before the body is ready (thus outweighing other risks), use of blockers to treat gender dysphoria in patients already at their natural puberty pushes them *away* from the mean age of the healthy population. Instead of avoiding an objective problem, one is created: Among other things, patients become subject to the issues and risks associated with being late-bloomers, *very* late-bloomers. This transforms the risk:benefit balance, where the offsetting benefit is primarily (however validly) cosmetic.

67. Similarly, administering testosterone to an adult male to treat testosterone deficiency addresses both a different condition and a different population than administration of that same drug to an adolescent female to treat gender dysphoria; the benefits and harms observed in the first case cannot be extrapolated to the second.

E. Mental health assessment used for gate-keeping medicalized transition establishes a *selection bias*, creating a statistical illusion of mental health improvement among the selected.

68. Importantly, clinics are expected to conduct mental health assessments of applicants seeking medicalized transition, disqualifying from medical services patients with poor mental health. (The adequacy of the assessment procedures of specific clinics and clinicians remains under debate, however.) Such gate-keeping—which was also part of the original “Dutch Protocol” studies—can lead to misinterpretation of data unless care is explicitly taken. A side-effect of excluding those with significant mental health issues from medical transition is that when a researcher compares the average mental health of the gender dysphoric individuals first presenting to a clinic with the average mental health of those who completed medical transition, then the post-transition group would show better mental health—but only because of the *selection bias*, (Larzelere 2004; Tripepi 2010) even when the transition had no effect at all.

V. Systematic reviews of safety and effectiveness have been conducted by the health care ministries/departments of several governments. They *unanimously* concluded the evidence on medicalized transition in minors to be of poor quality.

A. Understanding safety and efficacy.

69. Plaintiffs' experts assert that use of puberty blockers and cross-sex hormones on adolescents is "safe." This claim is unsupported by any substantial scientific evidence, depreciates widely recognized risks of serious harm to minors so medicalized, and ignores both the many unknowns and the growing international doubts about their use.

70. At the outset, it is important to understand the meaning of "safety" in the clinical context. The criteria for assessing safety involve two independent components, and discussion of the safety of hormonal interventions on the natural development of children requires consideration of both of them. The term *safety* in the clinical context represents a "risk:benefit ratio," not an absolute statement that can be extrapolated across applications. In clinical research, assessing safety requires simultaneous consideration of both components of the risk:benefit ratio. That is, treatments are not deemed simply "safe" or "unsafe," as the plaintiffs' experts repeatedly use those words. These dual components are reflected in FDA regulation:

There is reasonable assurance that a device is safe when it can be determined, based upon valid scientific evidence, that *the probable benefits* to health from use of the device for its intended uses and conditions of use, when accompanied by adequate directions and warnings against unsafe use, outweigh *any probable risks*. (Code of Federal Regulations Title 21 Sec. 860.7, italics added.)

71. Thus, for example, as I explain in further detail below, because the Endocrine Society did not undertake (or rely on) any systematic review of the efficacy of hormonal interventions to relieve gender dysphoria in minors (i.e., their benefits), and WPATH did not undertake (or rely on) any systematic review of the safety of hormonal interventions in minors (i.e., their risks), neither gathered the evidence necessary to assess the risk:benefit ratio of medicalized transition

in minors.

72. In fact, as I also review below, after conducting systematic reviews, the English, Finnish, and Swedish national health care institutions all concluded that there is insufficient evidence to determine that hormonal interventions as treatments for gender dysphoria in minors are safe. Reasons for these consistent conclusions include lack of research, insufficient research quality among the existing investigations, and insufficient investigation of long-term safety.

73. To understand the uniform conclusions of these national health care bodies, it is important to understand that—at least where there is *prima facie* reason to be concerned that certain harms may result—when the research has not been done, the absence of evidence cannot be taken as evidence of the absence of such harms. “We don’t know” does not permit the conclusion “It is safe.” Plaintiffs’ experts and many advocates in the field of transgender medicine make this error.

B. The McMaster University systematic review of systematic reviews.

74. McMaster University is recognized as a center of expertise in the performance of methodologically sound systematic reviews. In 2022, authors associated with that McMaster University team (Dr. Romina Brignardello-Petersen and Dr. Wojtek Wiercioch) conducted a systematic review, “Effects of gender affirming therapies in people with gender dysphoria: evaluation of the best available evidence,” spanning all the available systematic reviews in this area, including their methodological strength, the evidence they cited, and the conclusions they reached. (Brignardello-Petersen & Wiercioch 2022.) Applying carefully disclosed criteria and methods, they identified on-point systematic reviews, and graded the methodological quality of each on-point review as high, moderate, low, or critically low. With regard to systematic reviews relating to the effects of puberty blockers or cross-sex hormones, the authors included in their

analysis all reviews that achieved at least a “low” rating of methodological quality, while excluding those rated as “very low.” No systematic reviews earned a “high” methodological rating, except a review performed by the highly respected Cochrane Library of the effects of cross-sex hormones on transitioning natal males (Haupt 2020), but that most careful review in turn found *no* published studies on this topic of sufficient methodological soundness to satisfy its inclusion criteria and thus merit review. After this careful review of the data and analysis contained in available systematic reviews, the McMaster authors concluded:

Due to important limitations in the body of evidence, there is great uncertainty about the effects of puberty blockers, cross-sex hormones, and surgeries in young people with gender dysphoria. This evidence alone is not sufficient to support whether using or not using these treatments. (Brignardello-Petersen & Wiercioch 2022 at 5.)

C. The quality of the systematic reviews from governmental bodies and professional associations.

75. To ensure consideration of all available evidence, I compiled into a single table all the cohort studies of safety and effectiveness included by any of the systematic reviews from the international health care systems and (although they were incomplete) by the U.S.-based clinical associations issuing guidelines or standards. I discuss their specific findings in the following sections.

76. New studies continue to be conducted and published. I have identified two additional studies that were published after these reviews were released, but that meet their inclusion criteria: Tordoff, *et al.*, 2022, and Chen, *et al.*, 2023. The findings from both these studies are consistent with those already included and are noted here for completeness.

Table 1. Cohort studies of effectiveness and safety of puberty-blockers and cross-sex hormones in minors.

	Finland (2019)	NICE (2020a,b)	Sweden (2022)	E.S. (2017)	AAP (2018)	Baker (2021) (WPATH)
Effectiveness GnRHs	Costa et al, 2015 de Vries et al, 2011	Costa et al, 2015 de Vries et al, 2011	Becker-Hebly et al, 2020 Carmichael et al, 2021 Costa et al, 2015 *** Hisle-Gorman et al, 2021			de Vries et al, 2011
Effectiveness Sex Hormones	de Vries et al, 2014*	Achille et al, 2020 Allen et al, 2019 Kaltiala et al, 2020 Lopez de Lara et al, 2020	*** *** Cantu et al, 2020* de Vries et al, 2014*			Achille et al, 2020 de Vries et al, 2014* López de Lara et al, 2020
Safety (Bones) GnRHs		Brik et al, 2020 Joseph et al, 2019 Khatchadourian et al, 2014 Klink et al, 2015 Vlot et al, 2017	Joseph et al, 2019 Klink et al, 2015 Navabi et al, 2021 Schagen et al, 2020 Stoffers et al, 2019 Vlot et al, 2017 Lee et al, 2020 van der Loos et al, 2021			
Safety (Bloods) GnRHs		Klaver et al, 2020 Schagen et al, 2016	Klaver et al, 2018 Klaver et al, 2020 Nokoff et al, 2020 Perl et al, 2020 Schagen et al, 2016 Schulmeister et al, 2021			
Safety (Bones) Sex Hormones	***	Khatchadourian et al, 2014 Klaver et al, 2020 Klink et al, 2015 Kuper et al, 2020 Stoffers et al, 2019 Vlot et al, 2017		Klink et al, 2015		
Safety (Bloods) Sex Hormones			Jarin, 2017 Mullins et al, 2021 Tack et al, 2016			

*Included both puberty-blockers and cross-sex hormones.

**The Endocrine Society review included bone/skeletal health, but did not explicate whether the scope included minors.

***Sweden explicitly excluded due to high risk of bias: Achille, *et al.*, (2020), Allen, *et al.* (2019), de Vries, *et al.*, (2011), and López de Lara, *et al.*, (2020).

****The Finnish review adopted the Endocrine Society review, but did not indicate whether minors were included.

D. United Kingdom

77. The National Health Service (NHS) of the United Kingdom conducted an independent review of its services for minors with gender dysphoria. (Cass 2022.) Included in that process were two systematic, comprehensive reviews of the research literature, conducted by England’s National Institute for Health Care Excellence (NICE) in 2020. One regarded the efficacy, safety, and cost-effectiveness of Gonadotrophin-Releasing Hormone (GnRH) analogs (or “puberty blockers”) in minors. (NICE 2020a.) The other regarded the efficacy, safety, and cost-effectiveness of cross-sex hormones, or “gender-affirming hormones,” in minors. (NICE 2020b.) (Only efficacy and safety are relevant to the present report.)

78. The puberty-blocker review was tasked with reviewing the research on two relevant questions. For one:

In children and adolescents with gender dysphoria, what is the clinical effectiveness of treatment with GnRH analogues compared with one or a combination of psychological support, social transitioning to the desired gender or no intervention? (NICE 2020a at 4.)

Clinical effectiveness of puberty-blockers was composed of three factors deemed “critical outcomes”: impact on gender dysphoria, impact on mental health, and impact on quality of life.

The second question addressed in the review was:

In children and adolescents with gender dysphoria, what is the short-term and long-term safety of GnRH analogues compared with one or a combination of psychological support, social transitioning to the desired gender or no intervention? (NICE 2020a at 6.)

Puberty-blocker safety was assessed as its effect on three categories of health: bone density, cognitive development or functioning, and “other.”

79. The second review, for cross-sex hormone treatment, was tasked with the corresponding questions. For one:

In children and adolescents with gender dysphoria, what is the clinical effectiveness of treatment with gender-affirming hormones compared with one or a combination of psychological support, social transitioning to the desired gender or no intervention? (NICE 2020b at 4.)

The critical outcomes were again deemed to be impact on gender dysphoria, on mental health, and on quality of life. The impact on mental health was composed of indicators of depression, anxiety, and suicidality and self-injury. The second question was:

In children and adolescents with gender dysphoria, what is the short-term and long-term safety of gender-affirming hormones compared with one or a combination of psychological support, social transitioning to the desired gender or no intervention? (NICE 2020b at 7.)

Cross-sex hormone treatment safety was assessed as its effect on bone density and on “clinical parameters,” which included insulin, cholesterol, and blood pressure levels.

80. These two reviews included a systematic consolidation of all the research evidence, following established procedures for preventing the “cherry-picking” or selective citation favouring or down-playing any one conclusion, carefully setting out the criteria for including or excluding specific studies from the review, and providing detailed analyses of each included study. The whole was made publicly available, consistent with good practice.

81. The reviews’ results were unambiguous: For both puberty blockers and cross-sex hormones, “The critical outcomes for decision making are the impact on gender dysphoria, mental health and quality of life.” The quality of evidence for these outcomes was assessed as “very low” using the established GRADE procedures for assessing clinical research evidence. (NICE 2020a at 4; NICE 2020b at 4.) The reviews also assessed as “very low” the quality of evidence regarding “body image, psychosocial impact, engagement with health care services, impact on extent of satisfaction with surgery and stopping treatment” or (in the case of cross-sex hormones) of “detransition.” (NICE 2020a at 5; NICE 2020b at 6.) The review of puberty blockers concluded that of the existing research, “The studies included in this evidence review

are all small, uncontrolled observational studies, which are subject to bias and confounding,”
“They suggest little change with GnRH analogues [puberty blockers] from baseline to follow-
up.” (NICE 2020a at 13.) The cross-sex hormone review likewise reported a lengthy list of
methodological defects or limitations affecting all available studies. (NICE 2020b at 13-14.)

82. The NHS changed the language on its website describing puberty blockers and cross
sex hormones. It removed the statement that “The effects of treatment with GnRH analogues are
considered to be fully reversible,”² replacing that text with:³

Little is known about the long-term side effects of hormone or puberty blockers in
children with gender dysphoria. . . . [I]t is not known what the psychological
effects may be. It’s also not known whether hormone blockers affect the
development of the teenage brain or children’s bones.

83. As mentioned in the McMaster review, the highly respected Cochrane Library, based
in England, undertook a systematic review of studies of the safety and efficacy of the
administration of cross-sex hormones to natal males. That review focused primarily on adults
(age 16 and older). The results, including a detailed explanation of methodology and inclusion
criteria, were published in 2020. Unfortunately, but importantly, the Cochrane review found *zero*
studies, globally, that were sufficiently reliable to meet the inclusion criteria even at a “very low”
level of evidentiary quality. The authors reported:

Despite more than four decades of ongoing efforts to improve the quality of
hormone therapy for women in transition, we found that no RCTs or suitable
cohort studies have yet been conducted to investigate the efficacy and safety of
hormonal treatment approaches for transgender women in transition....We found
insufficient evidence to determine the efficacy or safety of hormonal treatment
approaches...for transgender women in transition. The evidence is very
incomplete, demonstrating a gap between current clinical practice and clinical
research. (Haupt 2020 at 10-11.)

The authors’ frustration at the total lack of reliable research was evident: “The lack of reliable

² BBC. Retrieved from <https://www.bbc.co.uk/sounds/play/m000kgsj>; Kurkup, J. (2020, June 4). *The Spectator*. Available from <https://www.spectator.co.uk/article/the-nhs-has-quietly-changed-its-trans-guidance-to-reflect-reality/>

³ NHS. Retrieved from <https://www.nhs.uk/conditions/gender-dysphoria/treatment/>

data on hormone therapy for transitioning transgender women should encourage the development of well-planned RCTs and cohort studies to evaluate widespread empirical practice in the treatment of gender dysphoria.” (Haupt 2020 at 10.)

E. Sweden

84. Sweden similarly commissioned a systematic review, published in 2022 and charged with addressing these three questions:

Are there any scientific studies explaining the increase in numbers seeking for gender dysphoria?

Are there any scientific studies on long-term effects of treatment for gender dysphoria?

What scientific papers on diagnosis and treatment of gender dysphoria has been published after the National Board of Health and Welfare in Sweden issued its national support for managing children and adolescents with gender dysphoria in 2015? (SBU Scoping Review Summary 2019.)

The databases searched included CINAHL (EBSCO), Cochrane Library (Wiley), EMBASE (Embase.com), PsychINFO (EBSCO), PubMed (NLM), Scopus (Elsevier), and SocINDEX (EBSCO). A total of 8,867 abstracts were identified, from which 315 full text articles were assessed for eligibility. The review concluded that “literature on management and long-term effects in children and adolescents is sparse,” that no RCTs have been conducted, and that there remains no explanation for the recent and dramatic increases in numbers of minors presenting with gender dysphoria. (SBU Scoping Review Summary 2019.) I have quoted other conclusions from the Swedish systematic review in Section II above.

F. Finland

85. Finland’s Ministry of Social Affairs and Health commissioned a systematic review, completed in 2019, of the effectiveness and safety of medicalized transition. (COHERE Recommendation 2020.) The review spanned both minors and adults and included both puberty

blockers and cross-sex hormones (Pasternack 2019). Three reviewers tabulated the results. In total, 38 studies were identified, of which two pertained to minors: de Vries (2011) and Costa (2015). The report noted that, because the methodological quality of the studies was already “weak” (no study including any control groups), the assessors declined detailed quality assessment of the existing studies. (Pasternack 2019 at 3.) I have quoted other conclusions from the Finnish systematic review in Section II above.

G. Norway

86. Norway’s investigation of its health care policy for gender dysphoric minors also revealed substantial safety concerns:

There are unsettled questions related to puberty blockers in young people. A published study shows that puberty-inducing hormones cause slower height growth and a slower increase in bone density. It is also noted that the effects on cognitive development have not been mapped. Unexplained side effects and long-term effects of both puberty blockers (hormone treatment) and gender-affirming hormone treatments are increasingly being questioned. However, experience with other patient groups shows that long-term use of sex hormones can affect disease risk. When people with gender incongruence are treated, it is with significantly longer duration and intensity of hormone treatment than hormone treatments for other conditions. (Ukom 2023.)

VI. The Endocrine Society, WPATH, and the American Academy of Pediatrics did not conduct systematic reviews of safety and efficacy in establishing clinical guidelines, despite systematic reviews being the foundation and gold standard of evidence-based care.

87. I have also examined the reviews conducted by the U.S.-based professional associations that have published standards and guidelines for the treatment of gender dysphoric youth. As detailed herein, and unlike the European reviews, none of the U.S.-based professional associations conducted a systematic review of both effectiveness and safety, without which they are unable to assess the risk:benefit ratio posed by medicalized transition of minors.

A. The Endocrine Society reviewed cross-sex hormones, but not puberty blockers. They reviewed safety, but did not review effectiveness research.

88. The Endocrine Society appointed a task force which commissioned two systematic reviews as part of updating their 2009 recommendations. (Hembree 2017.) The scopes of the two reviews were limited to physiological effects of cross-sex hormones, narrowly defined: “The first one aimed to summarize the available evidence on the effect of sex steroid use in transgender individuals on lipids and cardiovascular outcomes....The second review summarized the available evidence regarding the effect of sex steroids on bone health in transgender individuals.” (Hembree 2017 at 3873.) As described in the Endocrine Society Guidelines, those reviews did not, however, include the effectiveness of any treatment on mental health (quality of life, suicidality, rates of detransition, cosmetic or functional outcomes, or improvements in feelings of gender dysphoria). What appears to be the referenced review of lipids and cardiovascular outcomes (Maraka 2017) did not identify any study of adolescents, noting “literature addressing this clinical question in the pediatric/adolescent population is completely lacking.” (Maraka at 3921.) What appears to be the referenced review of bone health (Singh-Ospina 2017) identified only one small study on adolescents, involving 15 male-to-female and 19 female-to-male cases.

(Klink 2015.) Notably, the median duration of puberty-blocker administration was 1.2 years, leaving unknown the effects on children receiving blockers from puberty onset (usually age 9–10) to age 14 or 16.

89. Further, the Endocrine Society does not claim to have conducted or consulted any systematic review of the efficacy of puberty blockers or cross-sex hormones to reduce gender dysphoria or increase mental health or well-being by any metric. Nor does it claim to have conducted or consulted any systematic review of safety of any of these treatments for minors with respect to brain development, future fertility, actual reversibility, or any other factor of safety or adverse event other than cardiovascular disease and bone strength.

90. For all these reasons, I concur with the opinion of Dr. Guyatt, who has said that he finds “serious problems” with the Endocrine Society guidelines, among other reasons because the only systematic reviews those guidelines refer to did not look at the efficacy of the recommended hormonal interventions to improve gender dysphoria, which he termed “the most important outcome.” (Block, *Gender Dysphoria* 2023 at 4.)

91. The current Endocrine Society guidelines, released in 2017, include this disclaimer:

The Endocrine Society makes no warranty, express or implied, regarding the guidelines and specifically excludes any warranties of merchantability and fitness for a particular use or purpose. The Society shall not be liable for direct, indirect, special, incidental, or consequential damages related to the use of the information contained herein. (Hembree 2017 at 3895.)

The previous, 2009, version included no disclaimers. (Hembree 2009.)

B. WPATH reviewed effectiveness, but not the safety of medicalized transition of minors.

92. WPATH engaged in a multi-step process in updating its Standards of Care from version 7 to version 8. That process included commissioning a systematic review, which was published as Baker, *et al.* (2021) which included the disclaimer “The authors are responsible for

its content. Statements in this report do not necessarily reflect the official views of or imply endorsement by WPATH.” (Baker 2021 at 14.)

93. The literature search was completed in June 2020, and spanned 13 questions. Two questions related to the effectiveness of medicalized transition of minors: Question #10 was “[W]hat are the effects of suppressing puberty with GnRH agonists on quality of life?”, and question #11 was “[W]hat are the psychological effects (including quality of life) associated with hormone therapy?” (Sharma 2018; Baker 2021.) That is, the review included studies of the effectiveness of puberty blockers and cross-sex hormones, but, remarkably did not include any effort to determine the *safety* of either.

94. Baker (2021) identified that among all experimental evidence published on medicalized transition, a total of “Three studies focused on adolescents.” (Baker 2021 at 1.) These were Achille, *et al.* (2020), López de Lara, *et al.* (2020), and de Vries, *et al.* (2011, 2014). (Baker 2021 considered the two de Vries articles as a single study, because the later one included the subset of patients from the earlier one who continued in treatment. I will refer to this set as four studies, however, to be consistent with the other reviews.) Notably, in contrast with WPATH’s review, the Swedish review entirely excluded Achille *et al.* (2020), López de Lara *et al.* (2020), and de Vries *et al.* (2011) due to their high risks of bias. (SBU Scoping Review Appendix 2.) The Baker team did not use the GRADE system for assessing the quality of evidence, instead using the Methods Guide for Conducting Comparative Effectiveness Reviews.

95. The Baker team noted “no study reported separate results by gender identity for transgender youth.” (Baker 2021 at 3.) They also found that “No study reported on hormone therapy among nonbinary people.” (at 3.) (Despite this finding, WPATH SOC-8 now includes recommendations for people who identify as nonbinary.)

96. My assessment of the Baker review revealed that there were substantial discrepancies and misleading ambiguities in their reporting: Baker, *et al.* indicated in the abstract that “Hormone therapy was associated with increased QOL [quality of life], decreased depression, and decreased anxiety” (Baker 2021 at 1,) and that “Associations were similar across gender identity and age” (Baker 2021 at 12). This is not what its actual data tables showed, however. Table 2 presented the only study of QOL specifically among adolescents included in the review and indicated that “Mean QOL scores did *not* change.” (Baker 2021 at 7, italics added.)

97. The review, however, did not rate the quality of the studies of adolescents on their own, instead combining them with the studies of adults. (at 10, italics added.) Table 4 of that study presented three analyses of anxiety: One showed a decrease, and on the other two, “Mean anxiety score did *not* change.” (at 11, italics added.) Finally, the review also concluded, “It was impossible to draw conclusions about the effects of hormone therapy on death by suicide.” (at 12.) Even for the combined set, the review read the strength of evidence to be “low” for each of QOL, depression, and anxiety, and to be “insufficient” for death by suicide. (Baker 2021 at 13, Table 6.) Specifically, the review indicated, “There is insufficient evidence to draw a conclusion about the effect of hormone therapy on death by suicide among transgender people.” (at 13, Table 6.) Overall, “The strength of evidence for these conclusions is low due to methodological limitations.” (at 12.) Of particular concern was that “Uncontrolled confounding was a major limitation in this literature.” (at 12.)

98. Additionally, although WPATH commissioned the Baker review, WPATH did not follow its results. Baker 2021 indicated the use of two systematic quality assessment methods, called RoB 2 and ROBINS-I (Baker 2021 at 3); however, WPATH modified the conclusions that that process yielded. WPATH SOC-8 states, “This evidence is not only based on the published

literature (direct as well as background evidence) but also on consensus-based expert opinion.”

(Coleman 2022 at S8.) Moreover:

Recommendations in the SOC-8 are based on available evidence supporting interventions, a discussion of risks and harms, as well as feasibility and acceptability within different contexts and country settings. Consensus on the final recommendations was attained using the Delphi process that included all members of the guidelines committee and required that recommendation statements were approved by at least 75% of members. (Coleman 2022 at S8.)

99. By allowing “consensus-based expert opinion” to modify or overrule conclusions supported by systematic reviews that apply accepted criteria of evidentiary strength, WPATH has explicitly abandoned evidence-based medicine. As indicated already by the Pyramid of Evidence, “expert opinion” represents the *lowest* level of evidence in science, whereas systematic review, the highest. (Also, it is unclear what the authors mean by “background evidence.”) To modify systematic results according to committee opinion is to re-introduce the very biases that the systematic process is meant to overcome. The WPATH document attempts to claim the authority of a systematic review, while reserving the ability to “overrule” results that WPATH members did not like.

100. As to evidence supporting hormonal interventions in minors, WPATH asserted that “a systematic review regarding outcomes of [hormonal] treatment in adolescents is not possible” due to the lack of “outcome studies that follow youth into adulthood.” (Coleman 2022 at S46.) WPATH is correct that essential outcome studies have not been done, but incorrect that this authorizes issuance of guidelines or standards in the absence of a systematic review. As Dr. Guyatt has stated, “systematic reviews are always possible”—and indeed an important conclusion from such a review may be (as here) that insufficient evidence exists to support any evidence-based guideline. As Dr. Guyatt further elaborated, if an organization issues recommendations without performing an on-point systematic review, “they’d be violating

standards of trustworthy guidelines.” (Block, *Dysphoria Rising*, 2023 at 3.)

101. Finally, the WPATH SOC-8 were revised immediately after their release, removing all age minimums to all recommendations. None of these studies and none of these reviews support such a change, and WPATH cites no studies or other document in support of the change.

102. In sum, the WPATH SOC8 cannot be called evidence-based guidelines under any accepted meaning of that term.

C. The American Academy of Pediatrics did not conduct a systematic review either of safety or effectiveness.

103. While the AAP policy statement is often referenced, the AAP did not report conducting any systematic review of any aspect of transgender care in producing its policy statement on gender-diverse children and adolescents. (Rafferty 2018.) Further, the AAP policy statement on its face is the work of a single author rather than of any committee or the membership more broadly (Dr. Rafferty “conceptualized,” “drafted,” “reviewed,” “revised,” and “approved” the statement), and the statement explicitly states that it does not “indicate an exclusive course of treatment” nor “serve as a standard of medical care.” (Rafferty 2018 at 1.)

VII. Definitions of sex, gender identity, and gender dysphoria.

A. Sex and sex-assigned-at-birth represent objective features.

104. Sex is an *objective* feature: It can be ascertained regardless of any declaration by a person, such as by chromosomal analysis or visual inspection. Gender identity, however, is *subjective*: There exists no means of either falsifying or verifying people’s declarations of their gender identities. In science, it is the objective factors—and only the objective factors—that matter to a valid definition. Objectively, sex can be ascertained, not only in humans or only in the modern age, but throughout the animal kingdom and throughout its long history in natural evolution.

105. I use the term “sex” in this report with this objective meaning, which is consistent with definitions articulated by multiple medical organizations:

Endocrine Society (Bhargava 2021 at 220.)

“Sex is dichotomous, with sex determination in the fertilized zygote stemming from unequal expression of sex chromosomal genes.”

American Academy of Pediatrics (Rafferty 2018 at 2 Table 1.):

“An assignment that is made at birth, usually male or female, typically on the basis of external genital anatomy but sometimes on the basis of internal gonads, chromosomes, or hormone levels.”

American Psychological Association (APA Answers 2014):

“Sex is assigned at birth, refers to one’s biological status as either male or female, and is associated primarily with physical attributes such as chromosomes, hormone prevalence, and external and internal anatomy.”

American Psychological Association (APA Resolution 2021 at 1):

“While gender refers to the trait characteristics and behaviors culturally associated with one’s sex assigned at birth, in some cases, gender may be distinct from the physical markers of biological sex (e.g., genitals, chromosomes).”

American Psychiatric Association (Am. Psychiatric Ass’n Guide):

“Sex is often described as a biological construct defined on an anatomical, hormonal, or genetic basis. In the U.S., individuals are assigned a sex at birth based on external genitalia.”

106. The phrases “assigned male at birth” and “assigned female at birth” are increasingly

popular, but they lack any scientific merit. Science is the systematic study of natural phenomena, and nothing objective changes upon humans' labelling or re-labelling it. That is, the objective sex of a newborn was the same on the day before as the day after the birth. Indeed, the sex of a fetus is typically known by sonogram or amniocentesis many months before birth. The use of the term "assign" insinuates that the label is arbitrary and that it was possible to have been assigned a different label that is equally objective and verifiable, which is untrue. Infants were born male or female before humans invented language at all. Indeed, it is exactly because an expected child's sex is known before birth that there can exist the increasingly popular "gender reveal" events. Biologically, the sex of an individual (for humans and almost all animal species) as male or female is irrevocably determined at the moment it is conceived. Terms such as "assign" obfuscate rather than clarify the objective evidence.

B. Gender identity refers to subjective feelings that cannot be defined, measured, or verified by science.

107. It is increasingly popular to define gender identity as a person's "inner sense," however, neither "inner sense" nor any similar phrase is scientifically meaningful. In science, a valid construct must be both objectively measurable and falsifiable with objective testing. The concept of an "inner sense" fits none of these requirements.

VIII. Gender Dysphoria is a mental health diagnosis.

108. Gender Dysphoria is a mental health condition identified by diagnostic criteria set out in the *Diagnostic and Statistical Manual of Mental Disorders* (“DSM”) 5-TR. (American Psychiatric Ass’n 2022.) While the criteria contain multiple components and vary modestly for children, adolescents, and adults, all cases are characterized by a strong and lasting desire to be the opposite sex, and “clinically significant” distress of sufficient severity to impair the individuals’ ability to function in their daily life setting. Gender dysphoria is nowhere defined as a medical (as opposed to mental health) diagnosis, and it is not characterized by any disability or impairment or ill health affecting any part of the physical body.

IX. Distinct mental health phenomena must not be—but frequently are—confused or conflated.

109. One of the most widespread public misunderstandings about transsexualism and people with gender dysphoria is that all cases of gender dysphoria represent the same phenomenon; however, the clinical science has long and consistently demonstrated that prepubescent children expressing gender dysphoria represent a phenomenon distinct from that of adults starting to experience it. That is, gender dysphoric children are not simply younger versions of gender dysphoric adults. They differ in virtually every objective variable measured, including in their responses to treatments. A third presentation has recently become increasingly observed among people presenting to gender clinics: these cases appear to have an onset in adolescence—after the onset of puberty and before adulthood—and occur in the absence of any childhood history of gender dysphoria. Such cases have been called adolescent-onset or “rapid-onset” gender dysphoria (ROGD). Despite having only recently been observed, they have quickly and greatly outnumbered the better characterized types. Moreover, large numbers of adolescents are today self-identifying in surveys as “gender fluid” and “non-binary.” These are not recognized mental health diagnoses, and do not relate in any known way to gender dysphoric groups that have been the subject of previous treatment outcome studies. Because each of these phenomena differ in multiple objective features, it is scientifically invalid to extrapolate findings from one type to the others.

A. Adult-Onset Gender Dysphoria consists predominantly of males sexually attracted to females.

110. Whereas Childhood-Onset Gender Dysphoria occurs in biological males and females and is strongly associated with later homosexuality (next section), Adult-Onset Gender Dysphoria consists primarily of biological males sexually attracted to females. (Lawrence 2010.)

They typically report being sexually attracted to women and rarely showed gender atypical (effeminate) behavior or interests in childhood (or adulthood). Some individuals express being sexually attracted to both men and women, and some profess asexuality, but very few indicate having a primary sexual interest only in men. (Blanchard 1988.) Cases of adult-onset gender dysphoria are typically associated with a sexual interest pattern involving themselves in female form (a paraphilia called autogynephilia). (Blanchard 1989a, 1989b, 1991.)

111. Because of the numerous objective differences between adult-, childhood-, and adolescent-onset gender dysphoria, it is not possible to extrapolate from these results to juvenile populations, which responsible authors are careful not to do.

B. Childhood-onset gender dysphoria (prepubertal-onset) is a distinct phenomenon characterized by high rates of desistance in the absence of social or medical transition.

112. For many decades, small numbers of prepubescent children have been brought to mental health professionals for help with their unhappiness with their sex and in the belief they would be happier living as the other sex. The large majority of childhood onset cases of gender dysphoria occur in biological males, with clinics reporting 2–6 biological male children to each female. (Cohen-Kettenis 2003; Steensma Evidence 2018; Wood 2013.)

1. Eleven cohort studies followed children not permitted social transition, all showing the majority to desist feeling gender dysphoric upon follow-up after puberty.

113. Currently, the studies of outcomes among children who experience gender dysphoria before puberty that provide the most evidentiary strength available are only “cohort studies,” which follow people over time, recording the outcomes of the treatments they have undergone. Such studies supersede (i.e., overrule) the outcomes of surveys, which are much more prone to substantial error. As I have explained above, however, cohort studies can describe developmental

pathways, but cannot provide evidence of causation.

114. In total, there have been 11 cohort studies showing the outcomes for these children, listed in Table 2. I first published this comprehensive list of studies in my own peer-reviewed article on the topic. (Cantor 2019.)

Table 2. Cohort studies of gender dysphoric, prepubescent children.

Count	Group	Study
2/16 4/16 10/16	gay trans-/crossdress straight/uncertain	Lebovitz, P. S. (1972). Feminine behavior in boys: Aspects of its outcome. <i>American Journal of Psychiatry</i> , 128, 1283–1289.
2/16 2/16 12/16	trans- uncertain gay	Zuger, B. (1978). Effeminate behavior present in boys from childhood: Ten additional years of follow-up. <i>Comprehensive Psychiatry</i> , 19, 363–369.
0/9 9/9	trans- gay	Money, J., & Russo, A. J. (1979). Homosexual outcome of discordant gender identity/role: Longitudinal follow-up. <i>Journal of Pediatric Psychology</i> , 4, 29–41.
2/45 10/45 33/45	trans-/crossdress uncertain gay	Zuger, B. (1984). Early effeminate behavior in boys: Outcome and significance for homosexuality. <i>Journal of Nervous and Mental Disease</i> , 172, 90–97.
1/10 2/10 3/10 4/10	trans- gay uncertain straight	Davenport, C. W. (1986). A follow-up study of 10 feminine boys. <i>Archives of Sexual Behavior</i> , 15, 511–517.
1/44 43/44	trans- cis-	Green, R. (1987). <i>The "sissy boy syndrome" and the development of homosexuality</i> . New Haven, CT: Yale University Press.
0/8 8/8	trans- cis-	Kosky, R. J. (1987). Gender-disordered children: Does inpatient treatment help? <i>Medical Journal of Australia</i> , 146, 565–569.
21/54 33/54	trans- cis-	Wallien, M. S. C., & Cohen-Kettenis, P. T. (2008). Psychosexual outcome of gender-dysphoric children. <i>Journal of the American Academy of Child and Adolescent Psychiatry</i> , 47, 1413–1423.
3/25 6/25 16/25	trans- lesbian/bi- straight	Drummond, K. D., Bradley, S. J., Badali-Peterson, M., & Zucker, K. J. (2008). A follow-up study of girls with gender identity disorder. <i>Developmental Psychology</i> , 44, 34–45.
47/127 80/127	trans- cis-	Steensma, T. D., McGuire, J. K., Kreukels, B. P. C., Beekman, A. J., & Cohen-Kettenis, P. T. (2013). Factors associated with desistence and persistence of childhood gender dysphoria: A quantitative follow-up study. <i>Journal of the American Academy of Child and Adolescent Psychiatry</i> , 52, 582–590.

17/139	trans-	Singh, D., Bradley, S. J., Zucker, K. J. (2021). A follow-up study of boys with Gender Identity Disorder. <i>Frontiers in Psychiatry</i> , 12:632784.
122/139	cis-	

*For brevity, the list uses “gay” for “gay and cis-”, “straight” for “straight and cis-”, etc.

115. The children in these studies were receiving professional mental health support during the study period, but did not “socially transition.” In sum, despite coming from a variety of countries, conducted by a variety of labs, using a variety of methods, at various times across four decades, every study without exception has come to the identical conclusion: among prepubescent children who feel gender dysphoric, the majority cease to want to be the other gender over the course of puberty—ranging from 61–88% desistance across the large, prospective studies. Such cases are often referred to as “desisters,” whereas children who continue to feel gender dysphoric are often called “persisters.”

116. This interpretation of these studies is widely accepted, including by the Endocrine Society, which concluded:

In most children diagnosed with GD/gender incongruence, it did not persist into adolescence. . . . [T]he large majority (about 85%) of prepubertal children with a childhood diagnosis did not remain GD/gender incongruent in adolescence. (Hembree 2017 at 3879.)

The developers of the Dutch Protocol, at the Vrije University gender clinic, likewise concluded based on these studies that “Although the persistence rates differed between the various studies...the results unequivocally showed that the gender dysphoria remitted after puberty in the vast majority of children.” (Steensma & Cohen-Kettenis 2011 at 2.)

117. The consistent observation of high rates of desistance among pre-pubertal children who present with gender dysphoria demonstrates a pivotally important—yet often overlooked—feature: because gender dysphoria so often desists on its own, clinical researchers cannot assume that therapeutic intervention cannot facilitate or speed desistance for at least some patients. That

is, it cannot be assumed that gender identity is immune to influence such as from psychotherapy. Such is an empirical question, and there has not yet been any such research.

118. These same studies are often vaguely cited to assert that the high desistance rates uniformly reported in these 11 studies do not apply to children who have persisted until “the start of puberty” (which is taken to mean Tanner Stage 2), or in an alternative phrasing, that children “who persist until the start of puberty” are likely to continue to persist into adulthood. But these studies taken together do not support that degree of precision. Rather, the studies do not specify at exactly what developmental stage the reported desistance occurred—what they report is that the subjects had desisted by late adolescence or early adulthood. I am aware of no systematic study that establishes that—in the absence of social and/or medical transition—children who experience gender dysphoria are unlikely to desist if they have not desisted by the start of Tanner Stage 2.

2. One cohort study followed children who were permitted social transition. In contrast with children not permitted to transition socially, most persisted in expressing gender dysphoria.

119. In contrast, Olson et al. have now published a single cohort study of prepubescent children, ages 3–12 (average of 8), who had already made a complete, binary (rather than intermediate) social transition, including a change of pronouns. (Olson 2022.) The study did not employ DSM-5 diagnosis, as “Many parents in this study did not believe that such diagnoses were either ethical or useful and some children did not experience the required distress criterion.” (Olson 2022.) Unlike the prior research studies, only 7.3% of these (socially transitioned) children ceased to feel gender dysphoric.

120. Although the team publishing this cohort study did not discuss it, their finding matches the prediction of other researchers, that social transition itself represents an active

intervention, such that social transition may *cause* the persistence of gender dysphoria when it would have otherwise resolved, avoiding any need for subsequent medicalization and its attendant risks. Conversely stated, social transition seems to prevent desistance. (Singh 2021; Zucker 2018, 2020.)

121. As recognized by multiple authors, the potential impact of social transition on rates of desistance is pivotal. The Endocrine Society cautions that “social transition...has been found to contribute to the likelihood of persistence.” (Hembree 2017 at 3879.) WPATH has stated that after social transition, “A change back to the original gender role can be highly distressing and [social transition can] even result in postponement of this second transition on the child’s part.” (Coleman 2012 at 176.) In 2013, prominent Vrije University researchers observed:

Childhood social transitions were important predictors of persistence, especially among natal boys. Social transitions were associated with more intense GD in childhood, but have never been independently studied regarding the possible impact of the social transition itself on cognitive representation of gender identity or persistence. [Social transition] may, with the hypothesized link between social transitioning and the cognitive representation of the self, influence the future rates of persistence. (Steensma 2013 at 588-589.)

3. There is no reliable method for predicting for which children who present with gender dysphoria will persist versus desist.

122. The Endocrine Society Guidelines stated in 2017 that “With current knowledge, we cannot predict the psychosexual outcome for any specific child” (Hembree 2017 at 3876), and this remains true today. Research has not yet identified any reliable procedure for discerning which children who present with gender dysphoria will persist, as against the large majority who will desist, absent transition and “affirmation.” Such a method would be valuable, as the more accurately that potential persisters can be distinguished from desisters, the better the risks and benefits of options can be weighted. Such “risk prediction” and “test construction” are standard components of applied statistics in the behavioral sciences. Multiple research teams have

reported that, on average, groups of persisters are somewhat more gender non-conforming than desisters, but not so different as to usefully predict the course of any particular child. (Singh 2021; Steensma 2013.)

123. In contrast, one research team (the aforementioned Olson group) claimed the opposite, asserting that they developed a method of distinguishing persisters from desisters, using a single composite score representing a combination of children's "peer preference, toy preference, clothing preference, gender similarity, and gender identity." (Rae 2019 at 671.) They reported a statistical association (mathematically equivalent to a correlation) between that composite score and the probability of persistence. As they indicated, "Our model predicted that a child with a gender-nonconformity score of .50 would have roughly a .30 probability . . . of socially transitioning. By contrast, a child with gender-nonconformity score of .75 would have roughly a .48 probability." (Rae 2019 at 673.) Although the Olson team declared that "social transitions may be predictable from gender identification and preferences" (Rae 2019 at 669), their actual results suggest the opposite: the gender-nonconforming group who went on to transition (socially) had a mean composite score of .73 (which is less than .75), and the gender-nonconforming group who did not transition had a mean composite score of .61, also less than .75. (Rae 2019, Supplemental material at 6, Table S1.) Both of those are lower than the value of .75, so both of those would be more likely than not to desist, rather than to proceed to transition. That is, Olson's model does not distinguish likely from unlikely to transition; rather, it distinguishes unlikely from even less likely to transition.

124. Further, in the absence of long-term follow-up, it cannot be known what proportion of those who transition and persist through the early stages of puberty will later (for example as young adults) come to regret having transitioned and then *detransition*. Because only a minority

of gender dysphoric children persist in feeling gender dysphoric in the first place, “transition-on-demand” increases the probability of unnecessary transition and unnecessary medical risks.

4. Temple Newhook’s attempts to dismiss evidence of high rates of desistance from childhood gender dysphoria are invalid.

125. The unanimous consistency across all 11 cohort studies of (non-transitioned) gender dysphoric children offers high confidence in the conclusion that most childhood-onset cases desist during the course of puberty. In 2018, however, a commentary was published, contesting that conclusion, criticizing four studies. (Temple Newhook 2018.) Multiple accomplished international researchers studying outcomes of gender dysphoric children responded (Zucker 2018; Steensma & Cohen-Kettenis 2018), to which the Temple Newhook team wrote a rejoinder. (Winters 2018.) I have reviewed each of these arguments, finding that the Temple Newhook comments rely on demonstrable falsehoods, whereas the responses remain consistent with the peer-reviewed evidence. The Temple Newhook commentary has not altered the consensus of the international medical community, which continues to cite and rely upon these cohort studies.

126. Before delineating each of their arguments, it should be noted that the Temple Newhook team based their analysis on the wrong research reports, attacking only a straw-person version of the contents of the research literature. Table 3 repeats the 11 cohort studies (on the left) and the four studies Temple Newhook criticized (right):

Table 3.

- Lebovitz (1972)
- Zuger (1978)
- Money & Russo (1979)
- Zuger (1984)
- Davenport (1986)
- Green (1987)
- Kosky (1987)
- Wallien & Cohen-Kettenis (2008)
- Wallien & Cohen-Kettenis (2008)

- Drummond, *et al.* (2008)
- Steensma, *et al.* (2013)
- Singh, 2012/Singh, *et al.* (2021)⁴
- Drummond, *et al.* (2008)
- Steensma, *et al.* (2011, 2013)

127. It should be noted that the Temple Newhook 2018 commentary does not represent a systematic review. Temple Newhook did not indicate search strategies, inclusion/exclusion criteria, coding methods, reliability checks, or other standard procedures used for ensuring objective and unbiased assessment of all relevant studies. Rather, the Temple Newhook analysis targeted a small and selective subset of the research available—a scientifically invalid endeavor, which the systematic review process is meant to prevent. Not only did Temple Newhook skip most of the relevant science, but conversely, Temple Newhook inserted the Steensma 2011 study, which should have been rejected. (The data it reported was already included in Wallien & Cohen-Kettenis 2008.) The Temple Newhook commentary claimed it was “systematically engaging scholarly literature” (Temple Newhook 2018 at 2); however, as the above reference lists demonstrate, that commentary involved no such systematic procedures.

128. Temple Newhook does not report any research evidence of its own. Rather, the commentary hypothesizes issues they assert could, theoretically, have affected the rates of desistance consistently detected. Scientifically, such a criticism is vacuous: In science, it is always possible for additional, external factors to have affected what was observed.

129. Also, as already detailed herein, the currently available level of evidence for outcomes of medicalized transition is the cohort study. The methodological issues highlighted by Temple Newhook are exactly why randomized, controlled trials (RCTs) need to be conducted, as such studies would be capable of resolving exactly those questions (in whichever direction). In the absence of randomized, controlled studies, however, the correct scientific process is to follow

⁴ At the time of the 2018 Temple Newhook commentary, the Singh *et al.*, 2021 study was available as Singh, 2012.

the results of the cohort studies (that is, the systematic reviews of the cohort studies).

130. In the science process, one cannot merely continue to retain a desired hypothesis, rejecting all counter-evidence until a perfect study emerges. This is especially important in clinical science, when the hypothesis relates to physical interventions, in children, with the potential to affect them for their entire lives. Rather, the scientific process proceeds by successive approximation, with results from the best available research replacing lesser quality research, increasing in confidence, but always with the possibility of changes imposed by future evidence.

131. By involving only a few of the full set of cohort studies, the Temple Newhook commentary removes one of the most compelling implications of the existing (cohort) studies: Their results are unanimous. However unlikely it might be for four studies to produce the same result randomly, it is even more unlikely for eleven studies all to come to the same result randomly.

132. Temple Newhook emphasized that gender identity issues differ across times and contexts/political environments, hypothesizing that children attending her clinic might differ from children attending the Toronto and the Amsterdam clinics. Returning once again to the full set of all studies, however, the evidence shows the very opposite: All studies yielded the same result, whether from the 1970s, 80s, 90s, 2000s, 2010s, and wherever in the world any clinic was. Acknowledging the possibility that future studies may lead to a different conclusion, the existing evidence shows majority desistance, constantly and across all time periods.

133. Consideration of the full set of studies also indicates that the contrast is not Toronto and Amsterdam versus whatever “reality” Temple Newhook perceives. Rather, they show the contrast is between Temple Newhook and every facility in every country ever reporting

desistance data on childhood-onset gender dysphoria. Moreover, despite Temple Newhook’s mention of influences of political cultures, that commentary does not point out that Canada and the Netherlands are much more politically liberal than the U.S. Although the commentary offers the hypothesis that the Canadian and Dutch contexts might decrease persistence, the commentary does not include the inverse possibility: that these liberal environments might be “iatrogenic”—that is, causing dysphoria to continue when it might otherwise remit.

134. Also, the very evidence suggesting that gender dysphoria can be influenced by local environmental factors is itself evidence that gender identity is not, in fact, an innate and immutable feature, potentially amenable to change.

C. Adolescent-Onset Gender Dysphoria, the predominant clinical population today, is a distinct and largely unstudied phenomenon.

135. Concurrent with the advent of social media, a third profile began appearing clinically and socially, characteristically distinct from the two previously identified profiles. (Kaltiala-Heino 2015; Littman 2018.) Despite lacking any history before the current generation, this profile has now numerically overwhelmed the previously known and better characterized types in clinics and on Internet surveys. Unlike adult-onset or childhood-onset gender dysphoria, this group is predominately biologically female. This group typically presents in adolescence, but lacks the history of cross-gender behavior in childhood like the childhood-onset cases have. It is that feature which led to the term Rapid Onset Gender Dysphoria (ROGD). (Littman 2018.)⁵ Cases commonly appear to occur within clusters of peers in association with increased social media use (Littman 2018), and among people with autism or other mental health issues. (Kaltiala-Heino 2015; Littman 2018; Warrier 2020.) (See section XI on Mental Health.) The

⁵ After initial criticism, the publishing journal conducted a reassessment of the article. The article was expanded with additional detail and republished. The relevant results were unchanged. Littman’s paper as revised has been widely cited.

patterns reported by Littman have now been independently replicated by another study which also found it to be a predominantly female phenomenon, associated with very high rates of social media use, among youth with other mental health issues, and in association with peers expressing gender dysphoria issues. (Diaz 2023.) Due to the multiple differences across the epidemiological and other objective variables, there is no justification for extrapolating findings from adult-onset or childhood-onset gender dysphoria to this new presentation.

136. There do not yet exist any cohort studies of people with adolescent-onset gender dysphoria undergoing medicalized transition. Current studies are limited to surveys typically of volunteers from activist and support groups on the Internet.

137. Moreover, no study has yet been organized in such a way as to allow for a distinct analysis of the adolescent-onset group, as distinct from childhood-onset or adult-onset cases. Many published studies fail to distinguish between people who had childhood-onset gender dysphoria and have aged into adolescence versus people whose onset was not until adolescence. (Analogously, there are reports failing to distinguish people who had adolescent-onset gender dysphoria and aged into adulthood from adult-onset gender dysphoria.) Studies selecting groups according to their current age instead of their ages of onset produces confounded results, representing unclear mixes according to how many of each type of case wound up in the final sample.

X. Suicide and suicidality are distinct phenomena representing different mental health issues and indicating different clinical needs.

138. *Suicide* refers to completed suicides and the sincere intent to die. It is substantially associated with impulsivity, using more lethal means, and being a biological male. (Freeman 2017.) *Suicidality* refers to *para*-suicidal behaviors, including suicidal ideation, threats, and gestures.

A. Rates of suicidality among all adolescents have skyrocketed with the advent of social media.

139. The CDC’s 2019 Youth Risk Behavior Survey found that 24.1% of female and 13.3% of male high school students reported “seriously considering attempting suicide.” (Ivey-Stephenson 2019 at 48.)

140. The CDC survey reported not only that these already alarming rates of suicide attempt were still increasing (by 8.1%–11.0% per year), but also that this increase was occurring only among female students. No such trend was observed among male students. That is, the demographic increasingly reporting suicidality is the same demographic increasingly reporting gender dysphoria. (Ivey-Stephenson at 51.)

141. The U.S. Substance Abuse and Mental Health Services Administration (SAMHSA) produces a series of evidence-based resource guides which includes their Treatment for Suicidal Ideation, Self-Harm, and Suicide Attempts Among Youth. It noted (*italics added*):

[F]rom 1999 through 2018, the suicide death rate doubled for females aged 15 to 19 and 20 to 24. For youth aged 10 to 14, the suicide death rate more than tripled from 2001 to 2018. Explanations for the increase in suicide may include bullying, social isolation, increase in technology and *social media*, increase in *mental illnesses*, and economic recession. (SAMHSA 2020 at 5.)

The danger potentially posed by social media follows from suicidality spreading as a social contagion, as suicidality increases after media reports, occurs in clusters of social groups, and in

adolescents after the death of a peer. (Gould & Lake 2013.)

142. Social media voices today loudly advocate “hormones-on-demand” while issuing hyperbolic warnings that teens will commit suicide unless this is not granted. Both adolescents and parents are exposed to the widely circulated slogan that “I’d rather have a living son than a dead daughter,” and such baseless threats or fears are treated as a justification for referring to affirming gender transitions as ‘life-saving’ or ‘medically necessary.’ Such claims grossly misrepresent the research literature, however. Indeed, they are unethical: Suicide prevention research and public health campaigns repeatedly warn against circulating messages that can be taken to publicize or even glorify suicide, due to the risk of copy-cat behavior they encourage. (Gould & Lake 2013.)

143. Systematic review of 44 studies of suicidal thoughts and behaviors in LGBTQ youth and suicidality found only a small association between suicidality and sexual minority stress. (Hatchel 2021.) The quantitative summary of the studies (an especially powerful type of systematic review called *meta-analysis*) found no statistically significant association between suicidality and any of having an unsupportive school climate, stigma and discrimination, or outness/openness. There were, however, significant associations between suicidality and indicators of social functioning problems, including violence from intimate partners, victimization from LGBT peers and from non-LGBT peers, and sexual risk taking.

B. *Suicidality* is substantially more common among females, and *suicide*, among males. Sexual orientation is strongly associated with suicidality, but much less associated with suicide.

144. Notwithstanding public misconceptions about the frequency of suicide and related behaviors, the highest rates of death by suicide are among middle-aged and elderly men in high income countries. (Turecki & Brent 2016 at 3.) Males are at three times greater risk of death by

suicide than are females, whereas suicidal ideation, plans, and attempts are three times more common among females. (Klonsky 2016; Turecki & Brent 2016.) In contrast with completed suicides, the frequency of suicidal ideation, plans, and attempts is highest during adolescence and young adulthood, with reported ideation rates spanning 12.1–33%. (Borges 2010; Nock 2008.) Relative to other countries, Americans report elevated rates of each of suicidal ideation (15.6%), plans (5.4%), and attempts (5.0%). (Klonsky 2016.) Suicide attempts occur up to 30 times more frequently than completed suicides. (Bachmann 2018.) The rate of completed suicides in the U.S. population is 14.5 per 100,000 people. (WHO 2022.)

145. There is substantial research associating sexual orientation with suicidality, but much less so with completed suicide. (Haas 2014.) More specifically, there is some evidence suggesting gay adult men are more likely to die by suicide than are heterosexual men, but there is less evidence of an analogous pattern among lesbian women. Regarding suicidality, surveys of self-identified LGB Americans repeatedly report rates of suicidal ideation and suicide attempts 2–7 times higher than their heterosexual counterparts. Because of this association of suicidality with sexual orientation, one must apply caution in interpreting findings allegedly about gender identity: because of the overlap between people who self-identify as non-heterosexual and as transgender or gender diverse, correlations detected between suicidality and gender dysphoria may instead reflect (be confounded by) sexual orientation. Indeed, other authors have made explicit their surprise that so many studies, purportedly of gender identity, entirely omitted measurement or consideration of sexual orientation, creating the situation where features that seem to be associated with gender identity instead reflect the sexual orientation of the members of the sample. (McNeil 2017.)

C. There is no evidence that medicalized transition reduces rates of suicide or suicidality.

146. It is repeatedly asserted that despite the known risks, despite the lack of research into the reality or severity of unquantified risks, it is essential and “the only ethical response” to provide medical transition to minors because medical transition is known to reduce the likelihood of suicide among minors who suffer from gender dysphoria. This is simply untrue. *No studies* have documented any reduction in suicide rates in minors (or any population) as a result of medical transition. No methodologically sound studies have provided meaningful evidence that medical transition reduces suicidality in minors. Instead, multiple studies show tragically high rates of suicide after medical transition, with that rate beginning to spike several years after medical transition.

147. Among post-transition adults, completed suicide rates remain elevated. (Wiepjes 2020.) Among post-operative transsexual adults in Sweden’s highly tolerant society, death by suicide is 19 times higher than among the cisgendered. (Dhejne 2011.) Systematic review of 17 studies of suicidality in transsexual adults confirmed suicide rates remain elevated even after complete transition. (McNeil 2017.) Among post-operative patients in the Netherlands, long-term suicide rates of six times to eight times that of the general population were observed depending on age group. (Asscheman 2011 at 638.) Also studying patients in the Netherlands, Wiepjes et al. (2020) reported the “important finding” that “suicide occurs similarly” before and after medical transition. (Wiepjes 2020 at 490.) In other words, *transition did not reduce suicide*. A very large dataset from the U.K. GIDS clinic showed that those referred to the GIDS clinic for evaluation and treatment for gender dysphoria committed suicide at a rate five times that of the general population, both before and after commencement of medical transition (Biggs 2022). Finally, in a still-ongoing longitudinal study of U.S. patients, Chen *et al.* have reported a

shockingly high rate of completed suicide among adolescent subjects in the first two years *after* hormonal transition, although they provide no pre-treatment data for this population to compare against. (Chen 2023 at 245.)

148. WPATH's systematic review of the effectiveness of puberty blockers and cross-sex hormones on suicide in minors concluded that "It was impossible to draw conclusions about the effects of [either] hormone therapy on death by suicide." (Baker 2021 at 12.) In short, I am aware of no respected voice that asserts that medical transition reduces suicide among minors who suffer from gender dysphoria.

149. As to the separate and far more common phenomenon of suicidality, of course, that claim is widely made. McNeil's systematic review revealed, however, a complicated set of interrelated factors rather than supporting the common hypothesis that rates of suicidal ideation and suicidal attempts would decrease upon transition. Rates of suicidal ideation did not show the same pattern as suicide attempts, male-to-female transitioners did not show the same patterns as female-to-male transitioners, and social transition did not show the same patterns as medical transition. Importantly, the review included one study that reported "a positive relationship between higher levels of social support from leaders (e.g., employers or teachers) and increased suicide attempt, which they suggested may be due to attempts instigating increased support from those around the person, rather than causing it." (McNeil 2017 at 348.)

150. Moreover, the 2020 Kuper, *et al.* cohort study of minors receiving hormone treatment found *increases* in each of suicidal ideation (from 25% to 38%), attempts (from 2% to 5%), and non-suicidal self-injury (10% to 17%). (Kuper 2020 at Table 5.) Research has found social support to be associated with *increased* suicide attempts, suggesting the reported suicidality may represent attempts to evoke more support. (Bauer 2015; Canetto 2021.)

151. Overall, the research evidence is only minimally consistent with the hypothesis that an absence of transition causes mental health issues and suicide, but very strongly consistent with the hypothesis that mental health issues, such as *Borderline Personality Disorder* (BPD), cause both suicidality and unstable identity formation (including gender identity confusion). (See section XI.) BPD is repeatedly documented to be greatly elevated among sexuality minorities (Reuter 2016; Rodriguez-Seiljas 2021; Zanarini 2021), and both suicidality and identity confusion are symptoms of that disorder. Thus, diverting distressed youth towards transition necessarily diverts youth away from receiving the psychotherapies designed for treating the issues actually causing their distress.

152. Despite that mental health issues, including suicidality, are repeatedly required by clinical standards of care to be resolved before transition, threats of suicide are instead oftentimes used as the very justification for labelling transition a “medical necessity”. However plausible it might seem that failing to affirm transition causes suicidality, the epidemiological evidence does not support that hypothesis.

XI. Mental health profiles differ across adult-, adolescent-, and childhood-onset gender dysphoria.

A. Mental health issues in Adult-Onset Gender Dysphoria.

153. Systematic review of all studies examining mental health issues in transgender adults identified 38 such studies. (Dhejne 2016.) The review indicated that many studies were methodologically weak, but nonetheless consistently found (1) that the average rate of mental health issues among adults is highly elevated both before *and after* transition, (2) but that the average was less elevated among adults who completed transition. It could not be concluded that transition improves mental health, however. Patients were commonly receiving concurrent psychotherapy, introducing a confound (meaning, again, that it cannot be determined whether the change was caused by the transitioning or the mental health treatment). Further, several studies showed more than 40% of patients to become “lost to follow-up.” It remains unknowable to what extent the information from the remaining participants accurately reflects the whole population.

B. Mental health issues in Childhood-Onset Gender Dysphoria.

154. Elevated rates of multiple mental health issues among gender dysphoric children are reported throughout the research literature. A formal analysis of children (ages 4–11) undergoing assessment at the Dutch child gender clinic showed that 52% fulfilled criteria for a formal DSM diagnosis of a clinical mental health condition other than Gender Dysphoria. (Wallien 2007 at 1307.) A comparison of the children attending the Canadian versus Dutch child gender dysphoria clinic showed only few differences between them, and a large proportion in both groups were diagnosable with clinically significant mental health issues. Results of standard assessment instruments (Child Behavior Check List, or CBCL) demonstrated that among 6–11-year-olds, 61.7% of the Canadian and 62.1% of the Dutch sample satisfied the diagnostic criteria for one or more mental health conditions other than gender dysphoria. (Cohen-Kettenis 2003 at 46-47.)

155. A systematic review of all studies of Autism Spectrum Disorders (ASDs) and Attention-Deficit Hyperactivity Disorder (ADHD) among children diagnosed with gender dysphoria was recently conducted. (Thrower 2020.) It was able to identify a total of 22 studies examining the prevalence of ASD or ADHD youth with gender dysphoria. Studies reviewing medical records of children and adolescents referred to gender clinics showed 6–26% to have been diagnosed with ASD. (Thrower 2020 at 695.) Moreover, those authors gave specific caution on the “considerable overlap between symptoms of ASD and symptoms of gender variance, exemplified by the subthreshold group which may display symptoms which could be interpreted as either ASD or gender variance. Overlap between symptoms of ASD and symptoms of GD may well confound results.” (Thrower 2020 at 703.) The rate of ADHD among children with GD was 8.3–11%. Conversely, data from children (ages 6–18) with Autism Spectrum Disorders (ASDs) show they are more than seven times more likely to have parent-reported “gender variance.” (Janssen 2016 at 63.)

156. As shown by the outcomes studies (see Section XIII), there is little reliable evidence that transition improves the mental well-being of children. As shown repeatedly by clinical guidelines from multiple professional associations, mental health issues are expected or required to be resolved *before* undergoing transition. The reasoning behind these conclusions is that children may be expressing gender dysphoria, not because they are experiencing what gender dysphoric adults report, but because they mistake what their experiences indicate or to what they might lead. For example, a child experiencing depression from social isolation might develop the hope—and the unrealistic expectation—that transition will help them fit in, as a member of the other sex.

157. In cases where gender dysphoria is secondary to a different issue, efforts at transition

are aiming at the wrong target and leave the primary issue(s) unaddressed. Given the highly reliable, repeatedly replicated finding that childhood-onset gender dysphoria resolves with puberty for the large majority of children, the evidence indicates that blocking a child's puberty blocks the child's natural maturation that itself would resolve the dysphoria.

C. Mental health issues in Adolescent-Onset Gender Dysphoria (ROGD).

158. The literature varies in the range of gender dysphoric adolescents with co-occurring disorders. In addition to self-reported rates of suicidality (see Section X), clinical assessments reveal elevated rates not only of depression (Holt 2016; Skagerberg 2013; Wallien 2007), but also anxiety disorders, disruptive behavior difficulties, Attention Deficit/Hyperactivity Disorder, Autism Spectrum Disorder, and personality disorders, especially Borderline Personality Disorder (BPD). (Anzani 2020; de Vries 2010; Jacobs 2014; Janssen 2016; May 2016; Strang 2014, 2016; Swedish Socialstyrelsen, Evolution 2020.)

159. Of particular concern in the context of adolescent-onset gender dysphoria is Borderline Personality Disorder (BPD; diagnostic criteria in Table X below). Symptoms of BPD overlap in important respects with symptoms commonly interpreted as signs of gender dysphoria, and it is increasingly hypothesized that very many cases appearing to be adolescent-onset gender dysphoria actually represent cases of BPD. (E.g. Anzani 2020; Zucker 2019.) That is, some people may be misinterpreting their experiencing of the broader "identity disturbance" of symptom Criterion 3 to represent a gender identity issue specifically. Like adolescent-onset gender dysphoria, BPD begins to manifest in adolescence, is three times more common in biological females than males, and occurs in 2–3% of the population, rather than 1-in-5,000 people. (Guilé 2018; Reuter 2016; Skodol 2003; Tomko 2014.) (Thus, if even only a portion of people with BPD experienced an identity disturbance, and focused that disturbance on gender

identity resulting in transgender identification, they could easily overwhelm the number of genuine cases of gender dysphoria.)

Table 4. DSM-5-TR Diagnostic Criteria for Borderline Personality Disorder.

A pervasive pattern of instability of interpersonal relationships, self-image, and affects, and marked impulsivity beginning by early adulthood and present in a variety of contexts, as indicated by five (or more) of the following:

1. Frantic efforts to avoid real or imagined abandonment. (Note: Do not include suicidal or self-mutilating behaviour covered in Criterion 5.)
2. A pattern of unstable and intense interpersonal relationship characterized by alternating between extremes of idealization and devaluation.
3. *Identity disturbance: markedly and persistently unstable self-image or sense of self.*
4. Impulsivity in at least two areas that are potentially self-damaging (e.g., spending, sex, substance abuse, reckless driving, binge eating). (Note: Do not include suicidal or self-mutilating behavior covered in Criterion 5.)
5. *Recurrent suicidal behaviour, gestures, or threats, or self-mutilating behavior.*
6. Affective instability due to a marked reactivity of mood (e.g., intense episodic dysphoria, irritability, or anxiety usually lasting a few hours and only rarely more than a few days).
7. Chronic feelings of emptiness.
8. Inappropriate, intense anger or difficulty controlling anger (e.g., frequent displays of temper, constant anger, recurrent physical fights).
9. Transient, stress-related paranoid ideation or severe dissociative symptoms. (Italics added.)

(American Psychiatric Association 2022 at 752-753.)

160. Mistaking cases of BPD for cases of Gender Dysphoria may prevent such youth from receiving the correct mental health services for their condition. A primary cause for concern is symptom Criterion 5: *recurrent suicidality*. (See Section X on suicide and suicidality.) Regarding the provision of mental health care, the distinction between these conditions is crucial: A person with BPD going undiagnosed will not receive the appropriate treatments (the currently most effective of which is Dialectical Behavior Therapy). The problem was not about *gender* identity, but about having an *unstable* identity.

161. Regarding research, there have now been several attempts to document rates of suicidality among gender dysphoric adolescents. The scientific concern presented by BPD is that it poses a potential confound: samples of gender dysphoric adolescents could appear to have elevated rates of suicidality, not because of the gender dysphoria (or transphobia in society), but because of the number of people with BPD in the sample.

D. Neuroimaging studies have associated brain features with sex and with sexual orientation, but not gender identity.

162. Claims that transgender identity is an innate property resulting from brain structure remain unproven. Neuroimaging and other studies of brain anatomy repeatedly identify patterns distinguishing male from female brains, but when analyses search for those patterns among transgender individuals, “gender identity and gender incongruence could not be reliably identified.” (Baldinger-Melich 2020 at 1345.) Although much smaller than male/female differences, statistically significant neurological differences are repeatedly associated with sexual orientation (termed “homosexual” vs “nonhomosexual” in the research literature). Importantly, despite the powerful associations between transsexuality and homosexuality, as explicated by Blanchard, many studies analyzing gender identity failed to control for sexual orientation, representing a problematic and centrally important confound. I myself pointed this out in the research literature, noting that neuroanatomical differences attributed to gender dysphoria should instead be attributed to sexual orientation. (Cantor 2011, Cantor 2012.) A more recent review of the science, by Guillamon, et al. (2016), agreed, stating:

Following this line of thought, Cantor (2011, 2012, but also see Italiano, 2012) has recently suggested that Blanchard’s predictions have been fulfilled in two independent structural neuroimaging studies. Specifically, Savic and Arver (2011) using VBM on the cortex of untreated nonhomosexual MtFs and another study using DTI in homosexual MtFs (Rametti et al., 2011b) illustrate the predictions. *Cantor seems to be right*. (Guillamon 2016 at 1634, italics added; see also Italiano 2012.)

In addition to this confound, because snapshot neurobiological studies can provide only correlational data, it would not be possible for such studies to distinguish whether brain differences cause gender identity or if gender atypical behavior modifies the brain over time, such as through neuroplasticity. As noted by one team of neuroscientists, “[I]t remains unclear if the differences in brain phenotype of transgender people may be the result of a sex-atypical neural development or of a lifelong experience of gender non-conformity.” (Fisher 2020 at 1731.) In sum, at present assertions that transgender identity is caused by neurology represent faith, not science.

XII. Medicalized transition of gender remains *experimental*, lacking causal evidence of mental health improvement.

A. Criteria distinguishing ‘*experimental*’ from ‘*established*’.

163. In science, the term “experimental” has a specific technical meaning. Within the scientific method, research studies can be *observational* or *experimental*. Among observational studies, such as surveys, the researchers do not administer any treatment and instead only describe the features of the group observed. Among experimental studies, treatments are actively administered by the researchers, who then compare the treated and untreated groups (or compare a group to itself, before versus after treatment). Also, within a given treatment study, the term “experimental treatment” would be used to distinguish it from the “control treatment” or “treatment-as-usual” being provided to the control group.

164. Outside research studies and within public and legal contexts, the term ‘experimental’ typically denotes ‘*unverified by experimental evidence.*’ A treatment would continue to be experimental until the demonstration of (1) reliable, clinically meaningful improvement and (2) the reliable estimation of safety risks in randomized, controlled trials (RCTs) or research of equivalent level of evidence. A treatment would remain experimental while its effects, including side effects, remain uninvestigated.

165. Being long-standing, popular, or familiar do not, of themselves, impact whether a treatment is experimental—they suggest opportunities for the experiments to have been done. Clinicians’ feelings of self-confidence do not impact status as experimental.

B. International consensus explicitly regards gender transition to be experimental.

166. In England, after a thorough review of the literature and the current practice, Dr. Cass stated that the critical and currently unanswered question “is whether the evidence for the use

and safety of the medication is strong enough as judged by reasonable clinical standards.” She recognized that these treatments cannot formally be called “experimental” not because they are proven, but because the experiments needed to test their efficacy and safety have not only not been done, but are not even being attempted. (Cass 2022 at 37.) To address this, Dr. Cass called for “the rapid establishment of the necessary research infrastructure to prospectively enrol young people being considered for hormone treatment into a formal research programme.” (Cass Review Letter 2022). In response, in its interim service specification NHS England states that it “will only commission GnRHa [i.e., puberty blockers] in the context of a formal research protocol.” (NHS 2022 at 12.)

167. Finland, by law, restricts all assessment and treatment activities for gender dysphoric minors to its two research clinics, Helsinki University Central Hospital and Tampere University Hospital. (COHERE Summary.) Further, after conducting a systematic review of the research, the council responsible for the assessment of public health care services in Finland (COHERE Finland) concluded, “In light of available evidence, gender reassignment of minors is *an experimental practice*.” (COHERE Summary, italics added.)

168. Sweden’s research on gender transition is conducted at the Karolinska Institutet in Stockholm. In 2015, that facility registered its research on medicalized transition with the U.S. National Institutes for Health (NIH), noting “[H]ormonal treatment includes inhibition of one’s own sex hormone production followed by treatment with testosterone or estrogen levels that are normal for the opposite sex. *Seen as experimental model*, this is a process that provides an opportunity to study the sex hormone dependent influences.” (Clinicaltrials.gov.) In its policy updates in 2021, Sweden limited medicalized treatments for gender dysphoria in minors to clinical research studies approved by the Swedish national research ethics board (“EPM”).

(Medscape Psychiatry 2021.)

169. Norway reviewed its own national policy on transition in minors in 2023, explicitly concluding such medical procedures to be experimental. (Ukom 2023.)

170. The widely cited Dutch studies were co-conducted by Dr. Thomas Steensma. Despite being an originator and international leader of medicalized transition of gender dysphoric minors, Dr. Steensma stated in an interview in 2021 that he still considers it to be experimental: “Little research has yet been done on the treatment with puberty inhibitors and hormones in young people. That is why it is also *seen as experimental*.” Dr. Steensma decried other clinics for “blindly adopting our research” despite the indications that those results may not actually apply: “We don’t know whether studies we have done in the past are still applicable to today. Many more children are registering, and also a different type.” Steensma opined that “every doctor or psychologist who is involved in transgender care should feel the obligation to do a good pre- and post-test.” (Tetelepta 2021.) But few if any are doing so.

C. Claims that medical transition is “medically necessary” are undefined, unsupported, and self-interested.

171. While European health authorities have examined the science and concluded that medical transition for minors remains “experimental” and of unproven benefit, terminology has been distorted in the U.S. because the U.S. lacks a public health care system and the terms “medically necessary” and “experimental” impact health insurance coverage. “Medically necessary” justifies coverage for these procedures; advocates know or fear that the term “experimental” will preclude coverage.

172. WPATH’s 2016 statement asserting “medical necessity” was explicitly made in order to facilitate insurance claims, as is clear in their document entitled, “Position Statement on Medical Necessity of Treatment, Sex Reassignment, and Insurance Coverage in the U.S.A.”

(WPATH Position Statement.) The AMA released a similar statement supporting insurance coverage for medical transition as a result of being assertedly medically necessary.⁶ U.S. medical associations’ advocacy corresponds to the financial interests of their members.

173. Moreover, there do not exist a scientific definition or objective criteria of “medically necessary.” An analysis published in the *Canadian Medical Association Journal*, however (not pertaining to gender dysphoria or transition), attempted to define ‘medically necessary.’ (Caulfield 2012.) The article quoted Timothy Caulfield, Research Chair in Health, Law, and Policy at the University of Alberta (Edmonton), Canada: “As for putting great effort into coming up with a tidy, all-encompassing definition of ‘medically necessary’—it’s probably a waste of time...Given the history of the concept of ‘medically necessary’ and the numerous failed attempts to define it, a practical, operational and meaningful definition is likely unattainable.” (Caulfield at 1771–1772.) According to Mark Stabile, director of the School of Public Policy and Governance and professor of economics and public policy at the Rotman School of Management at the University of Toronto, “Providers of those services will naturally be critical of the decision if they feel that the demand for their services will decline as a result.” (Caulfield at 1772.)

D. WPATH repeatedly warns of untested hypotheses, continuing unknowns, and lack of research.

174. The latest (2022) WPATH Standards of Care v8 document avoided the word “experimental” in its guidelines, but instead repeatedly deployed terms and phrases that are synonymous with being experimental: “The criteria in this chapter [on assessment of adults] have been significantly revised from SOC-7 to reduce requirements and unnecessary barriers to care. *It is hoped that future research will explore the effectiveness* of this model.” (Coleman 2022 at S33, italics added.)

⁶ Available from <https://www.ama-assn.org/system/files/2019-03/transgender-coverage-talking-points.pdf>

175. The WPATH Standards of Care v8 (Coleman 2022) indicates the lack of experimental evidence available again and again (*italics added*):

- “It primarily includes an assessment approach that uses specific criteria that are examined by [a Health Care Provider, or] HCP in close cooperation with a TGD adult and does not include randomized controlled trials or long-term longitudinal research” (at S33.)
- “While there was *limited supportive research*, this recommendation was considered to be good clinical practice as it allows a more reversible experience prior to the irreversible experience of surgery” (at S40.)
- “Due to *the limited research in this area*, clinical guidance is based primarily on individual case studies and the expert opinion of HCPs” (at S41.)
- “While available research shows consistent positive outcomes for the majority of TGD adults who choose to transition...some TGD adults may decompensate or experience a worsened condition following transition. *Little research has been conducted to systematically examine variables that correlate with poor or worsened biological, psychological, or social conditions following transition*” (at S42.)
- “Future research would shed more light on gender identity development if conducted over long periods of time with diverse cohort groups” (at S45.)
- “In addition, elevated scrotal temperatures can be associated with poor sperm characteristics, and genital tucking could theoretically affect spermatogenesis and fertility (Marsh 2019) although *there are no definitive studies evaluating these adverse outcomes*. Further research is needed to determine the specific benefits and risks of tucking in youth” (at S54.)
- “*There is no formal research evaluating how menstrual suppression may impact gender incongruence and/or dysphoria*” (at S54-55.)
- “Currently, there are only preliminary results from retrospective studies evaluating transgender adults and the decisions they made when they were young regarding the consequences of medical-affirming treatment on reproductive capacity. It is important not to make assumptions about what future adult goals an adolescent may have” (at S57.)
- “*Only limited empirical research exists to evaluate such interventions*” (at S75.)
- “*Research has not been conclusive about when in the life span such detransition is most likely to occur, or what percentage of youth will eventually experience gender fluidity and/or a desire to detransition*” (at S77.)
- “Research on pitch-lowering surgeries is limited” (at S139.)
- “The number and quality of research studies evaluating pitch-lowering surgeries are currently insufficient” (at S141.)
- “To date, *research on the long-term impact of [Gender Affirming Hormone Treatment*

or] *GAHT on cancer risk is limited...We have insufficient evidence to estimate the prevalence of cancer of the breast or reproductive organs among TGD populations (Joint et al., 2018.)*” (at S144.)

- “Contraceptive *research gaps within this population are profound. No studies have examined* how the use of exogenous androgens (e.g., testosterone) may modify the efficacy or safety profile of hormonal contraceptive methods (e.g., combined estrogen and progestin hormonal contraceptives, progestin-only based contraceptives) or non-hormonal and barrier contraceptive methods” (at S162.)
- “TGD individuals AFAB undergoing abortion still represents a critical gap in research” (at S162.)
- “The effects of current TGD-related medical treatments on sexuality are heterogeneous (Ozer et al., 2022; T’Sjoen et al., 2020), and *there has been little research on the sexuality of TGD adolescents*” (at S163.)
- “While sex-positive approaches to counseling and treatment for sexual difficulties experienced by TGD individuals have been proposed (Fielding, 2021; Jacobson et al., 2019; Richards, 2021), to date *there is insufficient research on the effectiveness of such interventions*” (at S163.)

XIII. There have been 11 cohort studies of puberty blockers and cross-sex hormones in minors. They provide no reliable evidence of effectiveness for improving mental health relative to mental health treatments that lack medical risk.

176. Several studies are cited by plaintiffs' experts and in the media as purporting to show that medical transition in minors brings important improvements in mental health beyond the issues of suicide and suicidality that I have already addressed. In fact, there is no reliable evidence of any such benefit.

177. In this section, I summarize the results of all cohort studies investigating the mental health outcomes of puberty blockers and cross-sex hormones on minors. These include all such studies identified by any of the systematic reviews of effectiveness from England, Sweden, Finland, and WPATH. (Listed in Table 1, *Cohort studies of effectiveness and safety of puberty blockers and cross-sex hormones in minors.*)

178. As enumerated in the following section, all of these studies that reported improved mental health among transitioners were also providing psychotherapy at the same time. (See Section VI on confounding.) None of these studies was able to differentiate which of them was contributing to the improvement.

179. The problem imposed by confounding medicalized transition with psychotherapy is widely recognized. As explicated in the NICE review from England:

[V]ery little data are reported on how many children and adolescents needed additional mental health support, and for what reasons, or whether additional interventions, and what form and duration (for example drug treatment or counselling) that took. This is a possible confounder for the treatment outcomes in the studies because *changes in critical and important outcomes may be attributable to external care rather than the psychological support or GnRH analogues used in the studies.* (NICE 2020a at 41, italics added.)

Similarly, WPATH's own systematic review noted that "[T]his conclusion is limited by high risk of bias in study designs, small sample sizes, and *confounding with other interventions.*" (Baker

2021 at 1, italics added.)

180. The need to disentangle the roles of these two treatments has been largely ignored despite the fact that several issues depend upon them. If medicalized transition does not show mental health improvement superior to that of mental health treatment, it cannot readily be called “medically necessary” for insurance purposes or other institutional needs. Clinicians may be subjecting minors to known and potential (but unstudied) harms without any scientific justification.

181. Moreover, without a control group for comparison (i.e., another group of similar age, sex, and mental health status), these studies are also unable to identify when and if any changes are due to regression to the mean or maturation over time.

A. Of the cohort studies, four found little to no mental health improvement.

182. Kaltiala, *et al.* (2020) similarly reported that after cross-sex hormone treatment, “Those who had psychiatric treatment needs or problems in school, peer relationships and managing everyday matters outside of home continued to have problems during real-life.”

(Kaltiala 2020 at 213.) They concluded:

Medical gender reassignment is not enough to improve functioning and relieve psychiatric comorbidities among adolescents with gender dysphoria. Appropriate interventions are warranted for psychiatric comorbidities and problems in adolescent development. (Kaltiala 2020 at 213.)

183. Cantu, *et al.* (2020) studied 80 youth, 11–18 years of age (average of 15.1 years), measuring patients’ levels of anxiety, depression, and suicidality. This sample was 18.75% male-to-female, 72.5% female-to-male, and 8.75% nonbinary, but the report did not include the patients’ ages of onset. The study authors compared youth according to those receiving puberty blockers only, cross-sex hormones only, both treatments, or neither. No significant differences in mental health were detected on any of these variables. Of the 27 youth reporting suicidality

before medicalized treatment, 81% continued to report suicidality after medicalized treatment. Remarkably, although the authors reported that “the results of this study suggest that no clinically significant changes in mood symptoms occur” (Cantu 2020 at 199), they did not convey the logical interpretation that transition failed to help these youth. Instead, they emphasized that “findings suggest changes may actually take longer to occur.” (Cantu 2020 at 196.)

184. Carmichael, *et al.* (2021) released their findings from the Tavistock and Portman clinic in the U.K. (Carmichael 2021.) Study participants were ages 12–15 (Tanner stage 3 and above for natal males, Tanner stage 2 and above for natal females) and were repeatedly tested before beginning puberty-blocking medications and then every six months thereafter. Cases exhibiting serious mental illnesses (*e.g.*, psychosis, bipolar disorder, anorexia nervosa, severe body-dysmorphic disorder unrelated to gender dysphoria) were excluded. Relative to the time point before beginning puberty suppression, there were *no* significant changes in any psychological measure, from either the patients’ or their parents’ perspective.

185. Hisle-Gorman, *et al.* (2021) analyzed military families’ healthcare data to compare 963 transgender and gender-diverse youth before versus after hormonal treatment, using their non-gender dysphoric siblings as a control group. The study participants included youth undergoing puberty-blocking as well as those undergoing cross-sex hormone treatment, but these subgroups did not differ from each other. Study participants had a mean age of 18 years when beginning hormonal treatments, but their initial clinical contacts and diagnoses occurred at a mean age of 10 years. According to the study, “mental health care visits overall did not significantly change following gender-affirming pharmaceutical care” (Hisle-Gorman 2021 at 1448), yet, “psychotropic medication use *increased*,” (Hisle-Gorman 2021 at 1448, italics added)

indicating *deteriorating* mental health.

B. Six of the cohort studies confounded medical treatment with psychotherapy.

186. The initial enthusiasm for medical blocking of puberty followed largely from early reports from the Dutch clinical research team suggesting at least some mental health improvement. (de Vries 2011, 2014.)

187. The Dutch clinical research team followed up a cohort of youth at their clinic undergoing puberty suppression (de Vries 2011), and later cross-sex hormone treatment and surgical sex reassignment (de Vries 2014). The youth improved on several variables upon follow-up as compared to pre-suppression measurement, including depressive symptoms and general functioning. No changes were detected in feelings of anxiety, or anger, or in gender dysphoria itself as a result of puberty suppression. Moreover, natal females suffered *increased* body dissatisfaction both with their secondary sex characteristics and with nonsexual characteristics. (Biggs 2020.)

188. The reports' own authors noted that while it remains possible that the improvement on some variables was due to the puberty blockers, it was also possible that the improvement was due to the mental health support or to natural maturation. The study authors noted this explicitly: "All these factors may have contributed to the psychological well-being of these gender dysphoric adolescents." (de Vries 2011 at 2281.)

189. van der Miesen, et al. (2020) provided an update of the Dutch clinic's sample, reporting continued improvement in transitioners' psychological functioning, but the medical and psychological treatments remained confounded. Also, the authors indicate that the changing demographic and other features among gender dysphoric youth might have caused the treated group to differ from the control group in unknown ways. The study authors expressly noted,

“The present study can, therefore, not provide evidence about the direct benefits of puberty suppression over time and long-term mental health outcomes.” (van der Miesen 2020 at 703.)

190. Allen, *et al.* (2019) reported on a sample of 47 youth, ages 13–20, undergoing cross-sex hormone treatment. They reported observing increases in measures of well-being and decreases in measures of suicidality; however, as the authors also noted, “whether a patient is actively receiving psychotherapy” may have been a confounding variable. (Allen 2019.)

191. Becker-Hebly, *et al.* (2021) assessed the quality of life and overall functioning of a sample of German youth both before and after undergoing treatment with GnRH α , CSHT, or both. Excluded from participating were youth with severe psychiatric issues, including suicidality. Of the sample, 79% of the sample participated in psychotherapy at the same time. As the study authors were careful to indicate, “Because this study did not test for statistically significant differences between the four intervention groups or before and after treatment, the findings cannot be generalized to other samples of transgender adolescents.” (Becker-Hebly 2021 at 1755.)

192. In Kuper, *et al.* (2020), a multidisciplinary team from Dallas used a battery of mental health tests to assess 148 youth undergoing either puberty-blocking or cross-sex hormone treatment. The tests revealed highly inconsistent results: Most revealed no significant change, some indicated improvement, and some indicated deterioration. Because 144 of the 148 participants were also in treatment with a therapist or counselor (Kuper at 7, Table 4), no conclusions can be drawn regarding the cause of the improvements. Similarly, 47% of the sample were receiving psychiatric medication at the time of their initial assessments, but it was 61% of the sample at the follow-up time: It cannot be known to what extent mental health improvement was associated with transition-related or with psychiatric medication. Importantly,

the variables demonstrating deterioration included each of the ones indicating suicidality and self-harm: At follow-up time, the sample showed *higher* levels of suicidal ideation (from 25% to 38%), suicide attempts (from 2% to 5%), and “non-suicidal self-injury” (from 10% to 17%) (Kuper at 8, Table 5, reprinted below.)

TABLE 5 Suicidal Ideation, Suicide Attempt, and NSSI

	Lifetime, <i>n</i> (%)	1–3 mo Before Initial Assessment, ^a <i>n</i> (%)	Follow-up Period, <i>n</i> (%)
Passive ideation	105 (81)	33 (25)	51 (38)
Suicide attempt	20 (15)	3 (2)	6 (5)
NSSI	68 (52)	13 (10)	23 (17)

^a One month for passive ideation and 3 months for NSSI and suicide attempt(s).

193. This evidence of worsening mental health was highly obscured in the Kuper report, however. Rather than provide the standard comparison of pre- and post-treatment rates, Kuper instead listed the post-treatment rates along side the full *lifetime* rates: “Lifetime and follow-up rates were 81% and 39% for suicidal ideation, 16% and 4% for suicide attempt, and 52% and 18% for NSSI, respectively” (p. 1). Rates from over a lifetime are necessarily higher numbers, and putting them where pre-treatment rates normally appear conveys the statistical illusion of a decrease, exactly opposite to the actual pattern.

C. Two found no advantage of medicalization over psychotherapy.

194. Costa, *et al.* (2015) provided preliminary outcomes from a small study conducted with patients of the GIDS clinic in the UK. They compared the psychological functioning of one group of youth receiving psychological support with a second group receiving both psychological support as well as puberty blocking medication (representing an “active comparator” group. See Section III.C.2). The “untreated” group, however, was different from the treated group in another important respect, in that these were the patients who began with such severe psychiatric co-morbidities that they were deemed ineligible to begin puberty blockers

until mental health improved. Further, the study suffered a dramatic loss-to-follow-up, with almost two thirds of participants dropping out across just 18 months. (Biggs 2019.) In this preliminary report, both groups improved in psychological functioning over the course of the study, but no statistically significant difference between the groups was detected at any point. (Costa 2015 at 2212, Table 2.) In any event, all these findings have been superseded, however, and are moot. The final outcomes report for this cohort was subsequently published (as Carmichael 2021, above), finding that neither group actually had experienced any significant improvement at all. (Carmichael 2021.)

195. Achille, *et al.* (2020) at Stony Brook Children’s Hospital in New York studied a sample of 95 youth with gender dysphoria, but 45 were lost-to-follow-up within just 12 months, failing to complete follow-up surveys at 6 month and or 1 year. That is, outcomes were available only for the 50 who remained in the study. As well as receiving puberty blocking medications, “Most subjects were followed by mental health professionals. Those that were not were encouraged to see a mental health professional.” (Achille 2020 at 2.) Upon follow-up, some incremental improvements were noted; however, after statistically adjusting for psychiatric medication and engagement in counselling, “*most predictors did not reach statistical significance.*” (Achille 2020 at 3, italics added.) That is, puberty blockers did not improve mental health any more than did mental health care on its own. More specifically, only one of the 12 predictors reached statistical significance. (Achille 2020 at Table 4.) That is, medicalized transition was not associated with improved mental health beyond improvement associated with the mental health care received. Moreover, the single predictor reaching the threshold for statistical significance is not reliable: the study authors made a methodological error by failing to account for the multiple comparisons it conducted. Had the study applied the standard

adjustment for correcting for multiple comparisons, that remaining predictor would also have ceased to be statistically significant.

196. Tordoff, et al. (2022) reported on the mental health of youth (mean age 15.8) as they underwent their first year of puberty blocker or cross-sex hormone treatment. Of the initial 104, 62.5% were receiving psychotherapy at the same time. (Tordoff 2022 at 5 Table 1.) An unknown number of participants were also receiving psychiatric medications, which the report acknowledged as a potential confounding factor. There were 104 participants at the beginning of the study, but by the end, only 65 remained. Importantly, the report failed to indicate its procedures for assessing the mental health readiness of prospective transitioners, and the results are highly susceptible to selection bias between those deemed eligible for hormones or puberty blockers, and those who were not.

D. One failed to report whether psychotherapy was provided.

197. Chen, et al. (2023) reported finding some improvement in some mental health variables associated with the cosmetic changes after two years of cross-sex hormone treatment in a sample of 315 youth (mean age, 16 years). Unlike the other studies, Chen et al. did not report how many participants were receiving psychotherapy or psychiatric medication at the same time as the hormone treatments. It is therefore not possible to assess to what extent any changes were due to hormone treatment versus the potential confounds. Because the study did not include a control group, it is not possible to assert that changes were due to hormone treatment rather than representing regression to the mean (see Section III.C.1. *Biases representing 'regression to the mean'*). Potential conclusions are also hampered by the large proportion of mental health data that were missing: Of the 315 youth in the sample, analyses could be conducted with only 208–217 (Chen 2023, supp. Material at 12, Table S5). The purported changes in mental health

variables were statistically significant, but not clinically meaningful. The depression test used by Chen et al consisted of 21 items, with each item contributing up to 3-points to the total score. For example:

- 0 I do not feel sad.
- 1 I feel sad.
- 2 I am sad all the time and I can't snap out of it.
- 3 I am so sad and unhappy that I can't stand it.

Thus, the total scores range from 0 to 63. Scores 0–13 represent minimal difficulty; 14–19 represent mild depression; 20–28, moderate; and 29–63, severe. The change that Chen et al. found after two years of hormone treatment was from 16.39 to 13.95 (at Table S5). Changes of this size are unlikely to be associated with patients reporting they feel better. Such scores are below the “minimum clinically important difference.” (Button 2015.) Although the report did not include data on co-morbid mental health diagnoses, it noted that two patients receiving cross-hormone treatment died by suicide (representing 0.6% mortality within just two years). (Chen 2023 at 240.)

198. In addition to the incomplete reporting of key aspects of the project and large proportion of missing data, Chen et al appears to have provided only a selected subportion of the information it collected. A knowledgeable journalist investigating transgender issues, Jesse Singal, identified documentation representing the full set of information the Chen et al team planned to collect. I have verified that documentation and have come to the same conclusion. As described by Singal:

In their study protocol, including a [version](#) that they submitted into a preregistration database, the researchers hypothesized that members of this cohort would experience improvement on eight measures, including ones that are just about universally recognized by youth gender researchers as important outcomes, such as gender dysphoria, suicidality, and self-harm. Then, in the published *NEJM* paper, the researchers changed their hypothesis and six of those variables were nowhere to be found. The two remaining—anxiety and depression—moved in a positive direction for trans boys (natal females) but not trans girls (natal

males). The researchers reported on three other variables, too, without explaining how they picked them (two improved for trans girls and boys, and one just for trans boys). (Singal 2023.)

199. This appears to represent “cherry-picking” of the findings being reported, rather than a comprehensive reporting on the complete set of evidence. Further, Chen et al. failed to balance the concrete and strikingly high rate of *completed* suicide among their sample against the very incremental mental health changes they claim, even though the ethical and clinical importance of those suicides is obvious.

XIV. Known and potential harms associated with administration of puberty blockers and cross-sex hormones to children and adolescents.

200. As I have explained, any conclusion about safety requires knowledge about and balancing of both risks and benefits.

201. In concluding that safety has not been established (see Section V above), national health authorities, authors of systematic reviews, and researchers have identified a number of harms which are either known to result from administration of puberty blockers and cross-sex hormones to children and adolescents, or can be reasonably anticipated but have not been sufficiently studied to reach any conclusion as to the likelihood or severity of harm.

202. When applying research regarding harms to clinical policy, several considerations need to be included: (1) The harms of medicalized transition of gender does or may differ between male-to-female and female-to-male cases, differ between ages of transition, and differ according to age-of-onset of the gender dysphoria. Evidence and conclusions about harms (and safety) cannot be generalized or extrapolated across such cases. (2) The evidence has strongly shown that after social transition of gender, minors are much more likely than otherwise to undergo medicalized transition of gender. Thus, the appropriate assessment of the risk:benefit ratio for social transition must include the increased risks posed by the medicalized path to which it is likely to lead. (3) The evidence has shown strongly that youth who undergo puberty blocking are highly likely to undergo cross-sex hormone treatment. Thus, the appropriate risk:benefit evaluation must also consider its potential implications over the full lifespan.

203. Systematic reviews of the evidence have identified fewer than 10 studies investigating potential harms of medicalized transition of minors at all, (NICE 2020a at 6) and most of these have been limited to bone and skeletal health. As concluded by the NICE systematic review, “A key limitation to identifying the effectiveness and safety of GnRH

analogues for children and adolescents with gender dysphoria is the lack of reliable comparative studies.” (NICE 2020a at 40.) With that said, numerous harms are either known, or reasonably anticipated by respected health authorities but thus far unmeasured.

A. Sterilization without proven fertility preservation options.

204. Clinical guidelines for the medical transition of gender among children include the need to caution and counsel patients and parents about what are euphemistically called “options for fertility preservation.” (e.g., Endocrine Society Guidelines, Hembree 2017 at 3872.) For children who are placed on puberty blockers at Tanner Stage 2, however, because most continue onto cross-sex hormones once they begin a medicalized approach to their dysphoria, no viable fertility preservation options exist. The decision to undergo medicalized transition also represents the decision never to have biological children of one’s own.

205. For the large new population of young people who are first being put on puberty blockers and/or cross-sex hormones at a somewhat later stage of puberty, no studies at all have been done of when, whether, or with what probability either males or females can achieve healthy fertility if they later regret their transition decision and cease taking puberty blockers and/or cross-sex hormones. Much less has this been studied as a function of the stage of development at which they began puberty blockers and/or cross-sex hormones, and how long their gonads were subjected to cross-sex hormones.

B. Permanent loss of capacity for breast-feeding in adulthood.

206. While the removal of the breasts of a biological female adolescent or young adult may be cosmetically revised, it is functionally irreversible; even if the person later regrets and detransitions before or during adulthood, breast-feeding a child will never be possible. To the adolescent determined to transition, this may seem no cost at all. To the future adult mother, it

may be a very severe harm indeed.

C. Lifetime lack of orgasm and sexual function.

207. There has not been systematic investigation of the effects on adult sexuality among people medically transitioned at an early stage of puberty. Notably, Dr. Marci Bowers, current President of WPATH, and surgeon with substantial experience conducting penis-to-vagina operations, opined, “If you’ve never had an orgasm pre-surgery, and then your puberty’s blocked, it’s very difficult to achieve that afterwards...I consider that a big problem, actually. It’s kind of an overlooked problem that in our ‘informed consent’ of children undergoing puberty blockers, we’ve in some respects overlooked that a little bit.” (Shrier 2021.) In my opinion as a psychologist and sex and couple’s therapist, this represents a large potential harm to future relationships and mental health to “overlook,” and must be taken into consideration in any serious risk:benefit analysis of “safety.”

D. Hormonal treatments during puberty interfere with neurodevelopment and cognitive development.

208. It is well known that pubertal hormone levels drive important stages of neural development and resulting capabilities, although the mechanisms are not yet well understood. Dr. John Strang (Research Director of the Gender Development Program at Children’s National Hospital in Washington, D.C.) (Terhune 2022), the Cass Report from the U.K., and the systematic review from Finland all reiterated the central importance and unknown effects of GnRH-agonists on windows, or “sensitive periods,” in brain development, notably including adolescence. As Dr. Cass put it:

A further concern is that adolescent sex hormone surges may trigger the opening of a critical period for experience-dependent rewiring of neural circuits underlying executive function (i.e. maturation of the part of the brain concerned with planning, decision making and judgement). If this is the case, brain maturation may be temporarily or permanently disrupted by puberty blockers, which could have

significant impact on the ability to make complex risk-laden decisions, as well as possible longer-term neuropsychological consequences. To date, there has been very limited research on the short-, medium- or longer-term impact of puberty blockers on neurocognitive development. (Cass Review Letter 2022 at 6.)

209. In a meta-analysis (a highly rigorous type of systematic review) of studies of neuropsychological performance, non-transsexual males undergoing puberty earlier show a different cognitive profile than those underdoing puberty later. The association of brain development with age of pubertal onset exists in humans as well as non-human animals. (Shirazi 2022.)

210. Even in adults, neuroscience studies employing MRI and other methods have shown that the blockade of normal levels of hormones associated with puberty and adulthood degrade brain performance. Thus, when GnRH-agonists are administered to adult biological women, several brain networks decrease in activity, and cognitive performance, such as working memory, declines. (Craig 2007; Grigorova 2006.)

211. In light of this science, multiple voices have expressed concern that blocking the process of puberty during its natural time could have a negative and potentially permanent impact on brain development (Cass 2022 at 38–39; Chen 2020; Hembree 2017 at 3874.) As Chen *et al.* (2020) observed:

[I]t is possible these effects are temporary, with youth ‘catching up’...However, pubertal suppression may prevent key aspects of development during a sensitive period of brain organization. Neurodevelopmental impacts might emerge over time, akin to the ‘late effects’ cognitive findings associated with certain [other] oncology treatments. (Chen 2020 at 249.)

Chen *et al.* (2020) noted that no substantial studies have been conducted to identify such impacts outside “two small studies” (at 248) with conflicting results. I have not identified any systematic review of neurodevelopment or cognitive capacity.

212. A related concern is that by slowing or preventing stages of neural development,

puberty blockers may impair precisely the mature cognitive capabilities that would be necessary to evaluation of, and meaningful informed consent to, the type of life-changing impacts that accompany cross-sex hormones. (See Section XV.)

E. Substantially delayed puberty is associated with medical harms.

213. The research cited by the WPATH Standards of Care includes the evidence that children whose natural puberty started very late (top 2.3% in age) have elevated risks of multiple health issues in adulthood. (Zhu & Chan 2017.) These include elevations in metabolic and cardiovascular disease, lower height, and decreased bone mineral density. It has not been studied whether these correlations also occur in children whose puberty is chemically delayed. Undergoing puberty much later than one's peers is also associated with poorer psychosocial functioning and lesser educational achievement. (Koerselman & Pekkarinen 2018.)

F. Elevated risk of Parkinsonism in adult females.

214. Epidemiological research has shown adult, non-transsexual women who undergo surgical removal of both ovaries to have substantially elevated odds of developing parkinsonism, including Parkinson's Disease, relative to age-matched women randomly selected from the local population in an on-going epidemiological study. (Rocca 2022.) The effect was greater among younger women, showing 7–8 times greater odds among women under 43. The observed delay between removal of ovaries and the onset of parkinsonism was 26.5 years. Whether chemically suppressing the ovaries of a biological female via puberty blockers during adolescence followed by cross-sex hormones will cause a similar increase in parkinsonism, or when, remains unknown.

G. Reduced bone density.

215. The systematic reviews by Sweden, Finland, and England all included bone health as an outcome. *The New York Times* also recently commissioned its own independent review of the

available studies. (Twohey & Jewett 2022.) These reviews all identified subsets of the same group of eight studies of bone health. (Carmichael 2021; Joseph 2019; Klink 2015; Navabi 2021; Schagen 2020; Stoffers 2019; van der Loos 2021; Vlot 2017.) These studies repeatedly arrived at the same conclusion. As described by *The New York Times* review:

[I]t's increasingly clear that the drugs are associated with deficits in bone development. During the teen years, bone density typically surges by about 8 to 12 percent a year. The analysis commissioned by *The Times* examined seven studies from the Netherlands, Canada and England involving about 500 transgender teens from 1998 through 2021. Researchers observed that while on blockers, the teens did not gain any bone density, on average—and lost significant ground compared to their peers.⁷ (Twohey & Jewett 2022.)

216. There is some evidence that some of these losses of bone health are regained in some of these youth when cross-sex hormones are later administered. The rebounding appears to be limited to female-to-male cases, while bone development remains deficient among male-to-female cases.

217. The long-term effects of the deficient bone growth of people who undergo hormonal interventions at puberty remain unstudied. The trajectory of bone quality over the human lifetime includes decreases during aging in later adulthood. Because these individuals may enter their senior years with already deficient bone health, greater risks of fracture and other issues are expectable in the long term. As the *New York Times*' analysts summarized, "That could lead to heightened risk of debilitating fractures earlier than would be expected from normal aging—in their 50s instead of 60s." Such harms, should they occur, would not be manifest during the youth and younger adulthood of these individuals. This distinction also represents one of the differences between adult transitioners and childhood transitioners and why their experiences cannot be extrapolated between them.

⁷ The eighth study was Lee, *et al.*, 2020, which reported the same deficient bone development.

218. There does not exist an evidence-based method demonstrated to prevent these outcomes. The recommendations offered by groups endorsing puberty blockers are quite limited.

As summarized by *The Times*:

A full accounting of blockers' risk to bones is not possible. While the Endocrine Society recommends baseline bone scans and then repeat scans every one to two years for trans youths, WPATH and the American Academy of Pediatrics provide little guidance about whether to do so. Some doctors require regular scans and recommend calcium and exercise to help to protect bones; others do not. Because most treatment is provided outside of research studies, there's little public documentation of outcomes. (Twohey & Jewett 2022.)

H. Short-term/Immediate side-effects of puberty blockers include sterile abscesses, leg pain, headache, mood swings, and weight gain.

219. The Cass Report summarized that "In the short-term, puberty blockers may have a range of side effects such as headaches, hot flushes, weight gain, tiredness, low mood and anxiety, all of which may make day-to-day functioning more difficult for a child or young person who is already experiencing distress." (Cass 2022 at 38.)

220. In 2016, the U.S. FDA began requiring drug manufacturers to add a warning about the psychiatric side effects, after reports of suicidal ideation and a suicide attempt began to emerge among children prescribed GnRH-agonists (for precocious puberty).⁸ The warning label on Lupron reads that "Psychiatric events have been reported in patients...such as crying, irritability, impatience, anger and aggression."

221. Other than the suicide attempt, such adverse effects may seem minor relative to the major health and developmental risks I have reviewed above, and they may be dismissed by children and by parents confronted by fears of suicidality and an urgent hope that transition will resolve the child's unhappiness and mental health issues. However, when assessing risk:benefit

⁸ Reuters Special Report; 2022, Oct. 6. Retrieved from <https://www.reuters.com/investigates/special-report/usa-transyouth-care/>

ratio for “safety” against the undemonstrated benefits claimed for hormonal interventions, these observed harms should not be ignored.

I. Long-term use of cross-sex hormones in adult transsexuals is associated with unfavorable lipid profiles (cholesterol, triglycerides) and other issues.

222. As the Cass Report correctly and succinctly indicated, “Sex hormones have been prescribed for transgender adults for several decades, and the long-term risks and side effects are well understood. These include increased cardiovascular risk, osteoporosis, and hormone-dependent cancers.” (Cass 2022 at 36.)

223. Minors who begin puberty blockers and proceed to cross-sex hormones—as almost all do—will require continuing treatment with cross-sex hormones for life, unless they go through the very difficult process of detransition. Because a lifetime dependence on cross-sex hormones is the expected course, the known adverse effects of cross-sex hormones on adults must also be part of the risk:benefit analysis of the “safety” of putting a minor on cross-sex hormones (and indeed, of the initial decision to put a child on puberty blockers).

224. Systematic review identified 29 studies of the effects of cross-sex hormone treatment on cardiovascular health in adults. (Maraka 2017.) By the two-year follow-up mark among female-to-male transitioners, hormone administration was associated with increased serum triglycerides (indicating poorer health), increased low-density-lipid (LDL) cholesterol (indicating poorer health), and decreased high-density-lipid (HDL) cholesterol (indicating poorer health). Among male-to-female transitioners at the two-year mark, cross-sex hormone treatment was associated with increased serum triglycerides (indicating poorer health).

XV. Assertions that puberty blockers act only as a “fully reversible” “pause button” are not supported by scientific evidence.

225. Plaintiffs’ experts, along with many advocates and organizations, have boldly asserted that the administration of puberty blockers to adolescents is “fully reversible.” The assertion is not consistent with or supported by any objective assessment of the existing science. Although withdrawal of the medication will allow the pubertal process to resume, that is very far from establishing that the impact of that interruption of natural development is “fully reversible.” The evidence is not that the person’s life will proceed as if the medical intervention never happened, as the popularized phrase suggests. Rather, the evidence repeatedly indicates that stopping a healthy child’s natural onset of puberty imposes multiple substantial harms, risks, or opportunity costs.

226. First, as I have previously mentioned (Section IV.D), it is scientifically invalid to extrapolate results from using puberty blockers to prevent precocious puberty by delaying the pubertal process to its normal age range, to using them to *prevent* normally occurring healthy puberty, merely assuming the effects and side-effects will be the same. The two are very different populations and very different uses.

227. Second, not all the effects of GnRHa’s in otherwise healthy children are known: It is therefore not possible to assess whether all effects are reversed or to what extent. Indeed, within the scientific method, it is never possible to demonstrate that any intervention is “fully reversible.” In science, it always remains possible for future evidence to identify an effect that does not reverse. To assert that all the effects of GnRHa’s are fully reversible is to assert that all its effects have been investigated and checked for reversibility, which is false.

228. Third, and more concretely, I have reviewed above a large number of medical and developmental risks which multiple responsible voices have associated with administration of

puberty blockers to adolescents, and which are either established by studies or have not been shown not to exist. In the face of this knowledge and lack of knowledge, it is scientifically unsupported and irresponsible to assert that this use of puberty blockers is “fully reversible” and “just a pause.”

229. Here, I identify additional psycho-social developmental impacts of delaying healthy, naturally-occurring puberty which are likely to be irreversible, but have not been meaningfully studied.

A. Stopping puberty does not stop time: Patients’ peers continue to develop and mature, with patients falling increasingly behind.

230. Initiating puberty blockers at Tanner Stage 2 (at the very first signs of puberty, typically ages 9 or 10) holds the child in a prepubescent state, while their peer group and classmates continue to grow. By the time many patients begin cross-sex hormone treatment, their peers will have completed puberty and progressed far into adolescence. Puberty may become unblocked, but these children have irreversibly lost the opportunity and experience of developing with their peers and must instead do so alone.

231. Being a “late bloomer,” indeed among the latest possible bloomers, has psychological consequences of its own. Having the body and mind of a prepubescent child while one’s friends have grown into physically mature sixteen-year-olds is extreme. Despite being a teenager chronologically, remaining prepubescent both physically and mentally while the lives of one’s peers have advanced to teenagers’ interests only increases the isolation of children already reporting social distress. There does not exist a means of distinguishing how much of any improvement in mental health that might be observed across these years in a particular study is simply the result of finally undergoing at least some pubertal development and finally catching up with one’s peers in at least some parameters.

232. Concretely, undergoing puberty much later than one's peers (as a result of naturally occurring rather than medically induced conditions) has been associated with poorer psychosocial functioning and lesser educational achievement. (Koerselman & Pekkarinen 2018.) Whether this holds true when the late puberty is the result of puberty blockers has not been studied.

B. Blocking puberty blocks awareness of sexuality and sexual orientation that can play an important role in the individual's understanding of gender identity.

233. As demonstrated unanimously by the cohort studies of prepubescent children with gender dysphoria, the great majority cease to feel gender dysphoric during the course of puberty. (Section IX.B.) Studies also find that many such children subsequently identify as gay or lesbian, providing a potential alternative source and understanding of their atypical childhood gender interests. But for all children, blocking puberty necessarily blocks the onset of adult sexual interest, sexual arousal, and sexual response which are part of "the usual process of sexual orientation and gender identity development." (Cass 2022 at 38.) That is, blocking the experience of sexual feelings and development blocks normal phenomena that enable the young person to understand sexuality and sexual orientation, as distinct from gender identity. As Dr. Cass summarized:

We do not fully understand the role of adolescent sex hormones in driving the development of both sexuality and gender identity through the early teen years, so by extension we cannot be sure about the impact of stopping these hormone surges on psychosexual and gender maturation. We therefore have no way of knowing whether, rather than buying time to make a decision, puberty blockers may disrupt that decision-making process. (Cass Review Letter 2022 at 5.)

Thus, contrary to the hypothesis that providing time might permit more considered understanding and decision-making, the prevention of puberty blocks the awareness of a central factor that may well influence that understanding.

234. Because puberty blockers prevent prepubescent children from developing any understanding of sexual arousal and sexual relationships, such children are necessarily incapable of providing informed consent. There does not exist—indeed, there cannot exist—an age-appropriate way to equip a child who has not gone through puberty to make an informed decision about age-inappropriate issues, such as their future sex life, choices of sexual partners, sex-bonded relationships including marriage, and sacrificing ever experiencing orgasm.

C. Blocking puberty may block development of adult decision-making capacity.

235. As I have explained above, there are reasons to fear that use of puberty blockers may have permanent negative effects on brain development. That long-term risk aside, blocking puberty nevertheless threatens to prevent the child from growing towards adult decision-making capability during precisely the years in which he or she is being asked to make life-altering decisions about gender identity, gender presentation and cross-sex hormones. Pubertal brain development includes pervasive change in structural and functional connectivity (Chen 2020), re-balancing its capabilities between the acquisition of skills and knowledge and their application. Foremost among these are acquiring the abilities to control impulsivity and engage in rational and long-term decision-making (Crone & Steinbeis 2017), in association with development of a brain region called the “prefrontal cortex,” and similarly acquiring the capacity to process adult social interaction, in association with the development of a network of brain areas (Kilford 2016), collectively called the “social brain.” To understand medicalized transition of gender and its known and unknown consequences is one of the most complicated questions that a young person today could face, and a prepubescent brain is not equipped to process that information rationally, objectively, and with a whole lifetime rather than immediate desires and social pressures in mind.

D. Time spent on puberty blockers poses significant opportunity costs.

236. One of the primary, if not the foremost, justifications for medically transitioning children and adolescents is to reduce the psychological distress they report. That hypothesis interprets these children's psychological concerns (e.g., anxiety and depression) to gender dysphoria and/or external sources (e.g., transphobia). As I have noted here previously, however, many gender dysphoric children and adolescents suffer from multiple other mental health issues. In several studies of minors on puberty blockers, a substantial portion of the subjects do not report ongoing psychological care. If years spent on puberty blockers in the hopes that that will relieve distress distract from systematic efforts to directly address comorbidities through psychotherapy, then it diverts the minors from treatment which exhibits substantial evidence of effectiveness for improving mental health and lacks the multiple and significant side-effects of puberty blockers.

XVI. Assessments of clinical guidelines, standards, and position statements.

237. Several sets of recommendations have been offered regarding the clinical treatment of people with gender dysphoria. In this section, I comment on these protocols or recommendations individually.

A. The Dutch Protocol (aka Dutch Approach).

238. The Netherlands' child gender identity clinic in Amsterdam associated with the Vrije University (VU) was one of the international leaders in the use of hormonal interventions to treat gender dysphoria in minors. Researchers associated with that clinic have generated a large portion of the seminal research literature in the field. Key early publications from that group spelled out criteria and procedures that are collectively referred to as the "Dutch Protocol," and this approach has been widely influential internationally.

239. The purpose of the protocol was to compromise conflicting desires and considerations including: clients' initial wishes upon assessment; the long-established and repeated observation that those wishes will change in the majority of (but not in all) childhood cases; and that cosmetic aspects of medical transition are perceived to be better when they occur earlier rather than later in pubertal development.

240. The VU team summarized and explicated their approach in their paper, *Clinical management of gender dysphoria in children and adolescents: The Dutch Approach*. (de Vries & Cohen-Kettenis 2012.) Key components of the Dutch Approach are:

- no social transition at all considered before age 12 (watchful waiting period),
- no puberty blockers considered before age 12,
- cross-sex hormones considered only after age 16, and
- resolution of mental health issues before any transition.

241. For youth under age 12, "the general recommendation is watchful waiting and

carefully observing how gender dysphoria develops in the first stages of puberty.” (de Vries & Cohen-Kettenis 2012 at 301.)

242. The age cut-offs of the Dutch Approach were not based on any research demonstrating their superiority over other potential age cut-offs. Rather, they were chosen to correspond to the ages of consent to medical procedures under Dutch law. Nevertheless, whatever the original rationale, the data from this clinic simply contain no information about the safety or efficacy of employing these measures at younger ages.

243. The authors of the Dutch Approach repeatedly and consistently emphasize the need for extensive mental health assessment, including clinical interviews, formal psychological testing with validated psychometric instruments, and multiple sessions with the child and the child’s parents.

244. Within the Dutch Approach, there is no social transition before age twelve. That is, social affirmation of the new gender may not begin until age 12—as desistance is less likely to occur past that age. “Watchful Waiting” refers to a child’s developmental period up to that age. Watchful waiting does not mean do nothing but passively observe the child. Rather, such children and families typically present with substantial distress involving both gender and non-gender issues, and it is during the watchful waiting period that a child (and other family members as appropriate) would undergo therapy, resolving other issues which may be exacerbating psychological stress or dysphoria. As noted by the Dutch clinic, “[T]he adolescents in this study received extensive family or other social support [and they] were all regularly seen by one of the clinic’s psychologists or psychiatrists.” (de Vries 2011 at 2281.) One is actively treating the person, while carefully “watching” the dysphoria.

245. The use of hormonal interventions described in the Dutch Protocol, while markedly

more conservative than today’s practice in many U.S. clinics, has recently been criticized in detail in a peer-reviewed article as unjustified by reliable evidence (Biggs 2022; Levine 2023; Levine 2022). Certainly, the published research evidence base concerning safety and efficacy available to the VU clinicians is and was no greater than the global evidence base that the NICE review recently labelled as uniformly of “very low quality.”

246. Because clinical practices are often justified by alluding to the Dutch Protocol, however, it is important to be aware of the limitations on the use of hormones and puberty blockers specified by the Dutch Protocol and listed above (and thus the limits of the clinical evidence published out of the VU clinic) which are regularly ignored by clinicians in the U.S.

B. World Professional Association for Transgender Health (WPATH).

247. The WPATH standards of care have been lauded as long-established and high quality procedures. This does not reflect any objective assessment, however. The previous WPATH standards (version 7) were subjected to standardized evaluation, the Appraisal of Guidelines for Research and Evaluation (“AGREE II”) method. (Dahlen 2021.) That assessment concluded “[t]ransition-related [clinical practice guidelines] tended to lack methodological rigour and rely on patchier, lower-quality primary research.” (Dahlen 2021 at 6.) The WPATH guidelines were not merely given low scores, but received unanimous ratings of “Do not recommend.” (Dahlen 2021 at 7.)

248. Immediately after the release of the current (2023) version of WPATH’s standards (version 8), WPATH fundamentally altered it by removing from it minimum ages previously required for undergoing social or medical transition of gender. (WPATH Correction 2022.) This is despite the fact that age is the central component to young people’s emerging understanding of their sexual identities through social identity formation, pubertal development, and the onset of

sexual interest. The removal of age restrictions was not based on any research evidence at all— WPATH provided no reference to any study as justification, and the WPATH leadership have been explicit in indicating that the change was intended to prevent clinical care providers from legal liability for physicians rejecting those minimums. The implementation of such fundamental and dramatic changes, in the complete absence of any supporting science whatsoever, negates entirely any claim that WPATH represents evidence-based or empirically-supported treatment. As explicated herein, on Table 1, the systematic review on which WPATH based its standards for minors included exactly one study on puberty blockers and three studies on cross-sex hormones. All other references represent cherry-picked citations of studies rejected by its own systematic process. Moreover, even among the four studies in WPATH’s review, three were rejected by the Swedish review, due to the low quality of the science they contained.

C. Endocrine Society (ES).

249. As I have noted, in preparing its guidelines the Endocrine Society did not conduct systematic reviews of evidence relating to efficacy of any hormonal intervention in children or adolescents, and instead conducted reviews on only two safety-related endpoints.

250. Although outside the professional expertise of endocrinologists, mental health issues were also addressed by the Endocrine Society, repeating the need to handle such issues before engaging in transition, “In cases in which severe psychopathology, circumstances, or both seriously interfere with the diagnostic work or make satisfactory treatment unlikely, clinicians should assist the adolescent in managing these other issues.” (Hembree 2017 at 3877.) This ordering—to address mental health issues before embarking on transition—avoids relying on the unproven belief that transition will solve such issues.

251. The Endocrine Society did not endorse any affirmation-only approach. The guidelines

were neutral with regard to social transitions before puberty, instead advising that such decisions be made only under clinical supervision: “We advise that decisions regarding the social transition of prepubertal youth are made with the assistance of a mental health professional or similarly experienced professional.” (Hembree 2017 at 3870.)

252. The Endocrine Society guidelines make explicit that, after gathering information from adolescent clients seeking medical interventions and their parents, the clinician “provides correct information to prevent unrealistically high expectations [and] assesses whether medical interventions may result in unfavorable psychological and social outcomes.” (Hembree 2017 at 3877.)

253. The 2017 update of the Endocrine Society’s guidelines added a disclaimer not previously appearing:

The guidelines cannot guarantee any specific outcome, nor do they establish a standard of care....The Endocrine Society makes no warranty, express or implied, regarding the guidelines and specifically excludes any warranties of merchantability and fitness for a particular use or purpose. The Society shall not be liable for direct, indirect, special, incidental, or consequential damages related to the use of the information contained herein. (Hembree 2017 at 3895-3896.)

254. The Endocrine Society guidelines do not rely on any systematic review of evidence of *efficacy* of any form of treatment for gender dysphoria. The Dahlen et al. team also subjected these guidelines to review according to the AGREE II criteria, and two out of three independent reviewers concluded that they should *not* be used clinically. (Dahlen 2021 at 7.)

D. American Academy of Pediatrics (AAP).

255. A “Policy Statement” issued by the American Academy of Pediatrics (AAP) in 2018—which on its face declared to represent exclusively the work of one author who alone is “accountable for all aspects of the work”—is unique among the major medical associations in being the only one to endorse an affirmation-on-demand policy, including social transition

before puberty without any watchful waiting period. (Rafferty 2018.) Although changes in recommendations can obviously be appropriate in response to new research evidence, the AAP identified no such new evidence to justify a radical departure from the “therapy first” approach of the Dutch Protocol. Rather, the research studies AAP cited in support of its policy simply did not say what AAP claimed they did. In fact, the references that AAP cited as the basis of their policy instead outright contradicted that policy, repeatedly endorsing watchful waiting. (Cantor 2019.) Moreover, of all the outcomes research published, the AAP policy cited *one*, and that without mentioning the outcome data it contained. (Cantor 2019.)

256. Immediately following the publication of the AAP policy, I conducted a point-by-point fact-check of the claims it asserted and the references it cited in support. I submitted that to the *Journal of Sex & Marital Therapy*, a well-known research journal of my field, where it underwent blind peer review and was published. I append that article as part of this report. *See* Appendix 2. A great deal of published attention ensued; however, the AAP has yet to respond to the errors I demonstrated its policy contained. Writing for *The Economist* about the use of puberty blockers, Helen Joyce asked AAP directly, “Has the AAP responded to Dr Cantor? If not, have you any response now?” The AAP Media Relations Manager, Lisa Black, responded: “We do not have anyone available for comment.”

XVII. Assessment of plaintiffs' experts' reports.

257. In the body of my report above I have addressed the nature and strength of the scientific evidence concerning the primary scientific issues raised in the expert reports of Plaintiffs' experts. Here, I add a few remarks directed to specific evidentiary or logical defects in the opinions offered by specific experts.

A. Shumer

258. Dr. Shumer reported serving as an expert witness for the plaintiffs in the following cases, in which I served as an expert witness for the defense: *Roe et al v Utah High School Activities Association et al*; *Dekker et al v. Weida et al*. Although they were not indicted in his declaration, Dr. Shumer has also been retained by the plaintiffs in the following on-going cases, for which I have been retained by the defense: *Boe et al v. Marshall et al* (Alabama); *Doe et al v. Horne et al* (Arizona); *K.C. et al v. Medical Licensing Board* (Indiana).

259. Dr. Shumer reported being trained in pediatric endocrinology, not mental health. He is not qualified to assess the mental health of his patients. Patients undergoing medicalized transition require screening for mental health issues before entering his care at all.

260. Dr. Shumer's employment as director of a child and adolescent gender clinic represents a significant conflict of interest: The income he derives from providing medical services to these children would be directly affected by the outcome of this case. Individuals who stand to lose income on the basis of research findings cannot be objective in their assessment of those findings. (See Section I.B. on *Clinical vs. Scientific Expertise* and Section I.C. on the *Professional Standard on Conflict of Interest*.)

261. Dr. Shumer claimed the definition of "sex" includes "gender identity" (Shumer ¶24). His definition conflicts with the professional consensus, which excludes gender identity and

defines sex solely in terms of objective, biological features. (See Section, VII.A. *Sex and Sex-Assigned-at-Birth*.) Dr. Shumer cited as the source of his (erroneous) definition, a 2011 report on sexual minority health by the Institute of Medicine. Dr. Shumer’s claim is simply untrue.

From that document itself:⁹

Sex is understood here as a biological construct, referring to the genetic, hormonal, anatomical, and physiological characteristics on whose basis one is labeled at birth as either male or female. (Italics in original.)

That document’s glossary also included an entry for “sex,” which was:

(1) Generally understood as a biological construct, referring to the genetic, hormonal, anatomical, and physiological characteristics of males or females. Sex is typically assigned at birth based on the appearance of the external genitalia. Only when this appearance is ambiguous are other indicators of sex assessed to determine the most appropriate sex assignment. (2) All phenomena associated with erotic arousal or sensual stimulation of the genitalia or other erogenous zones, usually (but not always) leading to orgasm.

The definitions provided by Dr. Shumer’s own source match those I provided herein, and directly conflict with Dr. Shumer’s demonstrably false representation.

262. Also confirming the definition of sex I have provided here, the DSM-5-TR also defines sex solely in terms of objective, biological features (APA 2022 at 511):

[S]ex and *sexual* refer to the biological indicators of male and female (understood in the context of reproductive capacity), such as in sex chromosomes, gonads, sex hormones, and nonambiguous internal and external genitalia.” (Italics in original.)

263. Dr. Shumer defined gender identity as an “innate sense” (Shumer ¶25), which represents a fundamental violation of the scientific method. To be valid in science, a claim must be objective, testable, and falsifiable. (See Section IV.A.) If claims of sensory experiences that are impossible for anyone else to perceive were scientifically valid, then claims of sensing the company of spirits would represent evidence of ghosts. Gender identity is unlike emotions,

⁹ The source Dr. Shumer cited is available online at <https://www.ncbi.nlm.nih.gov/books/NBK64801/#ch2.s1>

which are associated with objectively measurable physiological changes, such as respiration and brain activity (Davidson, 2003; Seeley 2015). Gender identity is unlike sexual orientation, which can be objectively measured by genital and other physiological responses to sexual stimuli (Freund, 1967; Hess, 1965; Rieger, 2005). Gender identity is unlike disorders of sexual development (DSD's, also called "intersex conditions"), which are objectively detectable with physical measures such as chromosomal analysis (Vilain, 2006). To base decisions on subjective accounts that are indistinguishable from "because I said so" is not only to fail to provide evidence-based medicine, but also to misunderstand how to evaluate evidence at all.

264. Dr. Shumer's declaration was incorrect to claim gender identity is a "largely biological phenomenon" (Shumer ¶26). The research associates sexual orientation, not gender identity, with neurobiological features. (See Section, XI.D. *Neuroimaging Studies*.) Although Dr. Shumer cited Heylens, *et al.* (2012) as the basis of his claim that there are "genetic underpinnings to gender identity development," Dr. Shumer withheld the rest of Heylens' observation, noting exactly the confounding of gender identity with sexual orientation: "*In all the cases reported to be concordant for GID [i.e., 'match on gender identity'] there was also concordance for sexual orientation.*" (Heylens 2012 at 755, italics added.) The Endocrine Society guidelines similarly noted the association with sexual orientation. Contrary to Shumer's claim of a "strong biological foundation" (Shumer ¶28), the Endocrine Society emphasized that whatever hypotheses may currently be in play, *no* genetic marker (or other physical marker) enabling verification of transgender status has been identified. (Hembree 2017 at 3875.) Shumer cites no evidence of any biological or other objective marker (let alone a "strong" one) able to identify transgender identity.

265. Dr. Shumer claimed "Living consistent with one's gender identity is critical to the

health and well-being of any person,” citing three documents (Shumer ¶26); however, none of them provides evidence supporting such a causal claim, as Dr. Shumer’s phrasing insinuates. (See Section IV.B. *Correlation Does Not Imply Causation*.) These documents merely reiterate the opinions of their authors: Hidalgo *et al.* (2013) is an editorial; Shumer *et al.* (2013) represents Dr. Shumer’s comments about the Endocrine Society’s now obsolete 2009 guidelines, which were replaced in 2017; and White Hughto *et al.* (2015) reviews information about adults, not adolescents. Moreover, all three documents are quite outdated: Of the 11 research articles on outcomes (Section XIII. *Cohort Studies*), only one was published at the time (two, in the case of White Hughto).

266. Dr. Shumer claims that attempting to change a person’s understanding of their gender identity “has been found to be both harmful and ineffective” (Shumer ¶27), on the basis of the evidence in two articles based on a 2015 survey.¹⁰ Dr. Shumer’s interpretation of those articles is invalid, however: It is not possible for a survey to demonstrate that anything is either harmful or ineffective. These are both causal claims that surveys are not capable of demonstrating. (See Section III.F. *Surveys*.) Not only is there no study that has found that relying on psychotherapy and counseling support for a child or adolescent who suffers from gender dysphoria leads to worse outcomes than does hormonal intervention whether with or without psychotherapy, but also the studies that have compared these treatments failed to find superiority of medicalized transition (See Section XIII. *Cohort Studies*.)

267. Activists and social media increasingly, but erroneously, apply the term “conversion therapy,” moving farther and farther from what the research has reported. “Conversion therapy” (or “reparative therapy” and other names) has referred to efforts to change a person’s sexual

¹⁰ The citation of the Shumer declaration to “Campbell, et al., 2002” is an error and should be “Campbell, et al., 2022”.

orientation. More recently, any therapy failing to provide affirmation-on-demand is labeled “conversion therapy.” (D’Angelo, *et al.*, 2020.) Although the media and social media habitually add “T” to “GLB” in discussing these issues, the research on “conversion therapy” has investigated only sexual orientation, and its results cannot be extrapolated to gender identity by mere analogy.

268. Dr. Shumer was correct to assert that “All medical interventions, including treatment for gender dysphoria, require rigorous study and evidence base” (Shumer ¶33). As already detailed, the systematic reviews of the research have concluded unanimously that that very requirement has not been, and has yet to be, done. (See Section V. *Systematic Reviews*.)

269. Dr. Shumer’s “rationale for medical treatment of gender dysphoria in adolescents” (Shumer ¶34) is invalid. He cites five “studies demonstrating positive results of gender-affirming care” (Shumer ¶34.); however, none of these studies uses a design capable of demonstrating causality. In contrast with Dr. Shumer’s (mis)use of causal language, none of these studies is able to distinguish changes due to medicalized transition from changes due to the psychotherapy that the patients were receiving at the same time. (See Section IV.C. *Confounding*.)

270. There is no scientific basis, and Dr. Shumer cites no scientific evidence, for his claim that failing to provide or failing to permit medical transition causes harms (Shumer ¶¶38–39). Dr. Shumer cited Reisner (2015) as if that document provided such evidence, but it contains no such thing. Rather, Reisner (2015) describes a health care center’s implementation of:

a modified informed consent model for cross-sex hormone therapy...The informed consent model removed unnecessary barriers to hormone therapy, including restrictions specifying prolonged mental health evaluations and “real life tests” (i.e., living full-time in one’s self-identified gender) to obtain hormone therapy that had long been embedded in existing standards of care.

That document provided no evidence of the effects of its removal of those medical safeguards, or any objective determination of which safeguards might represent an ‘unnecessary barrier’.

271. Dr. Shumer’s claim of the successful outcomes of medical transition of adolescents conflicts with the conclusions of every systematic review of the safety and effectiveness research. (See Section XIII. *Cohort Studies*.) Dr. Shumer cited a single study (de Vries 2014), which is discussed in full herein. Dr. Shumer provided no indication of any consideration of any of the other evidence, other than cherry-picking this single reference.

272. Dr. Shumer rests his support for the procedures of the medicalized transition of minors on the perceived prestige of the associations issuing the guidelines (Shumer ¶¶45–53). His declaration included no indication or consideration of their lack of scientific support in that none of them is based on a systematic review of the evidence. (See Section VI. *Endocrine Society, WPATH, and American Academy of Pediatrics* and Section XVI. *Assessments of Clinical Guidelines*.) Dr. Shumer refers to the WPATH standards of care as “based on the best available science.” (Shumer ¶¶46, ¶48.) As I have detailed above, the WPATH SOC does not satisfy the definition of “evidence-based medicine,” and extensively ignores “the best available science.” Dr. Shumer did not address any of the long series of factual errors in AAP policy, as demonstrated by peer-reviewed fact-checking of its contents (Cantor, 2019).

273. In naming associations expressing support for WPATH or Endocrine Society guidelines, Dr. Shumer correctly noted that these were “associations *in the United States*” (Shumer ¶53). Dr. Shumer did not indicate that these same guidelines were repeatedly rejected *outside* the United States or that the stark contrast between these conclusions correspond to their financial and political differences: It is in the interests of American professional guilds to resist government regulation and prevent down any potential “slippery slope,” whereas governments with public health care systems are expected to regulate the medical industry according to the evidence.

274. Dr. Shumer acknowledged that the basis of his own practice was not the contents of the peer-reviewed research, but the policies of his professional guilds (Shumer ¶54). Following professional associations’ guidelines is time-saving for clinicians, but it is successful only when those associations establish their guidelines in accordance with the peer-reviewed evidence. As shown already herein, none of the U.S. associations have done that for this issue. Such associations have a good, but imperfect, history of following the science. A clinician following associations instead of the primary research studies is necessarily unable to detect the instances when the associations have strayed from the science. The increasing isolation of the U.S. clinical associations from the international consensus indicates this to be one of those situations.

275. Dr. Shumer claimed, without citation or evidence, that “puberty-delaying medication and hormone-replacement therapy—both individually and in combination—can significantly improve the mental health of adolescents” (Shumer ¶59). This claim too is in direct conflict with all systematic reviews of that evidence. (See Section XIII. *Evidence of effectiveness.*)

276. Dr. Shumer draws a profoundly false equivalence between the use of GnRH agonists to treat precocious puberty versus gender dysphoria (Shumer ¶63). First, precocious puberty is diagnosed with high accuracy and on the basis of objective evidence, and gender dysphoria is not. Second, the treatment of precocious puberty ends upon reaching the typical age of puberty, in contrast with the treatment of gender dysphoria, which goes on to the use of cross-sex hormones, causing sterility and requiring continuation for life. These represent vastly different risk:benefit ratios. Medical ethics require having much *stronger* evidence to justify greater risks, whereas the evidence for gender dysphoria is much *weaker*. Dr. Shumer similarly draws a false equivalence between gender dysphoria and cancer. Cancer, and not gender dysphoria, is diagnosed on the basis of objective evidence, is diagnosed with greater accuracy, and does not

have an alternative, such as psychotherapy, with no negative side effect profile at all.

277. Dr. Shumer's report provides a highly misleading discussion of the risks of GnRH agonists and cross-sex hormones. It is the sequential use of *both* medications that entails the greatest harms. Describing the (relatively) mild effects of using only one or only the other hides the much more profound effects of their interaction. Dr. Shumer similarly misleads the reader in comparing the use of these medications in adults—whose bones and reproductive organs are already fully developed—to their use in adolescents where they interfere with the attainment of that status. (See Section XIV. *Known and Potential Harms.*)

278. Despite his use of dramatic terms, Dr. Shumer is not a mental health expert qualified to assess mental health outcomes, and he cites no evidence to justify any predictions of suicidality or other predictions of outcomes. In contrast with Dr. Shumer's dire predictions, several entire countries have already ended their policies supporting medicalized transition of minors, and no such outcomes have resulted.

B. Janssen

279. Dr. Janssen's declaration indicated he served as an expert witness for the plaintiffs in *BPJ v WV Board of Education*. I served as an expert witness for the defense in that case, which is currently in progress. Although they were not indicted in his declaration, Dr. Janssen has also been retained by the plaintiffs in the following on-going cases, for which I have been retained by the defense: *Boe et al v. Marshall et al* (Alabama); *L.W. et al v. Skrmetti* (Tennessee); and *Poe et al v. Drummond et al* (Oklahoma).

280. Dr. Janssen's employment as Chief Psychiatrist of a child and adolescent gender clinic represents a significant conflict of interest: The income he derives from providing medical services to these children would be directly affected by the outcome of this case. Individuals

who stand to lose income on the basis of research findings cannot be objective in their assessment of those findings. (See Section I.B. on *Clinical vs. Scientific Expertise* and Section I.C. on the *Professional Standard on Conflict of Interest*.)

281. Dr. Janssen’s report does not provide the science of medicalized transition of minors. I could find no citation or mention of any of the systematic reviews of the topic, whether from an international health care system or a professional guild. Dr. Janssen cited a vanishingly small set of highly cherry-picked publications (nine in total), which do not reflect the state of the science. Four of Dr. Janssen’s ten citations represent self- (and/or parent-) report surveys (*i.e.*, Durwood, *et al.*, 2017; Olson, *et al.*, 2016; Turban, *et al.*, 2020a, 2020b). Surveys do not have the scientific rigour to qualify as medical evidence and are rejected by all systematic reviews as insufficient. (See Section III.F. *Surveys* and IV.A. *To Be Valid*.) Two of Dr. Janssen’s citations do not pertain to gender dysphoria at all (*i.e.*, Costello, *et al.*, 2003; Wilens, *et al.*, 2002). Dr. Janssen cites these as general support of the general idea that adolescents with one mental health diagnosis are likely to have others (Janssen ¶43).

282. In naming professional associations expressing support for WPATH’s clinical guidelines, Dr. Janssen correctly limited these to associations “in the United States” (Janssen ¶8), as did Dr. Shumer. Also like Dr. Shumer, Dr. Janssen did not indicate the international rejection of those same standards and the related issues. (See Section V. *Systematic Reviews of Safety and Effectiveness*.)

283. Dr. Janssen, like Dr. Shumer, defined gender identity as an “innate sense” (Janssen ¶17), and Dr. Janssen is in error for the same reasons, including that there is no such thing in science as an innate sense. (See Section VII.B. *Gender Identity Refers to Subjective Feelings*.)

284. Dr. Janssen, like Dr. Shumer, claimed “It is essential to a person’s mental health and

well-being to be able to live consistent with their gender identity” (Janssen ¶18). Dr. Janssen cited no evidence in support of his claim. As already detail herein, there does not exist any evidence demonstrating that the medicalized transition of minors improves their mental health. (See Section IV. *Methodological Defects*; Section XIII. *Cohort Studies*, Section X.C. *Suicidality*.)

285. Dr. Janssen, like Dr. Shumer, claimed “gender identity has a biological basis” (Janssen ¶19), although Dr. Janssen made the claim flatly, citing no evidence whatsoever. Dr. Janssen is in error, as was Dr. Shumer, in that the evidence has demonstrated a biological basis for sexual orientation, not gender identity. (See Section, XI.D. *Neuroimaging Studies*.)

286. Dr. Janssen referred to “evidence demonstrating that gender identity cannot be altered” (Janssen ¶20). Dr. Janssen not only failed to indicate just what evidence that was, but also his claim violates scientific thinking: In the science method (more formally called the “hypotheticodeductive method”) it is *not possible* to prove the null hypothesis. In science, one always starts with the assumption that features remain static until there is evidence of change. Dr. Janssen’s unreferenced claims to alleged attempts to cure transgender individuals is also in error: Such efforts had been attempted with sexual orientation, not gender identity. (See also ¶268 herein.)

287. Dr. Janssen claimed there to be “safe and effective treatments for gender dysphoria” (Janssen ¶¶29–33). His declaration did not include any of the systematic reviews of the research on safety or effectiveness, however, instead citing a small set of highly cherry-picked documents which do not, in fact, demonstrate medicalized transition of minors to be safe or effective. Of the sex studies cited by Dr. Janssen, three refer to surveys (i.e., Durwood 2017; Olson 2016; Turban 2020). As already noted herein, surveys represent extremely low quality evidence and

have been rejected as insufficient evidence by all the international systematic reviews. Surveys provide only correlation data, and Dr. Janssen violates scientific reasoning in making causal claims based on them. Finally, because of mental health screening procedures excluding youth with poorer mental health, the average level of mental health of those passing the screening procedures would necessarily be higher.

288. Dr. Janssen cited Olson *et al* (2016), claiming it to demonstrate that transition reduces risk of mental illness, which is not the whole truth. Although Olson did indeed report that gender dysphoric children showed no mental health differences from the non-transgender control groups, that report turned out to be incorrect: The Olson data were subsequently subjected to a re-analysis, which showed that, after correcting for statistical errors in the original analysis, the data instead showed that the gender dysphoric children under Olson’s care actually showed *poorer* mental health (Schumm & Crawford, 2020; Schumm, et al., 2019).

289. I conducted an electronic search of the research literature to identify any responses from the Olson team regarding the Schumm and Crawford re-analysis of the Olson data and was not able to locate any. I contacted Professor Schumm by email to verify that conclusion, to which he wrote there has been: “No response [from Olson].”

290. Dr. Janssen cited another retrospective study from the Olson team, published as Durwood, et al., 2017. That study also analyzed children in the TransYouth Project—people who have socially transitioned, their families, and any contacts they had, by word of mouth. This method is referred to as “convenience sampling,” and differs from genuinely representative samples in applying no means of ensuring study participants accurately represent the population being studied. There were three groups of children for comparison: (i) children who had already socially transitioned, (ii) their siblings, and (iii) children in a university database of families

interested in participating in child development research. As noted by the study authors, “For the first time, this article reports on socially transitioned gender children’s mental health *as reported by the children*” (Durwood 2017 at 121, italics added). In contrast, no reports or ratings were provided by any mental health care professional or researcher at all. That is, although adding self-assessments to the professional assessments might indeed provide novel insights, this project did not add self-assessment to professional assessment. Rather, it replaced professional assessment with self-assessment.

291. It is well established in the field of psychology that participant self-assessment can be severely unreliable for multiple reasons. For example, one well-known phenomenon in psychological research is known as “socially desirable responding”—the tendency of subjects to give answers that they believe will make themselves look good, rather than accurate answers. Specifically, subjects’ reports that they are enjoying good mental health and functioning well could reflect the subjects’ desire to be perceived as healthy and as having made good choices, rather than reflecting their actual mental health.

292. In their analyses, the study reported finding no significant differences between the transgender children, their non-transgender siblings, or the community controls. As the authors noted, “[t]hese findings are in striking contrast to previous work with gender-nonconforming children who had not socially transitioned, which found very high rates of depression and anxiety” (Durwood, et al., 2017, at 116). The authors are correct to note that their result contrasts with the previous research, but they do not discuss that this could reflect a problem with the novel research design they used: The subjective self-reports of the children and their parents’ reports may not be reflecting reality objectively, as careful professional researchers would. Because the study did not employ any method to detect and control for participants indulging in

“socially desirable responding” or acting under other biasing motivations, this possibility cannot be assessed or ruled out.

293. Because this was a single-time study relying on self-reporting, rather than a before-and-after transition study relying on professional evaluation, it is not possible to know if the children reported as well-functioning are in fact well-functioning, nor if so whether they are well-functioning because they were permitted to transition, or whether instead the fact is that they were already well-functioning and therefore permitted to transition. Finally, because the TransYouth project lacks a prospective design, it cannot be known how many cases attempted transition, reacted poorly, and then detransitioned, thus never having entered into the study in the first place. That is, the Durwood analysis failed to account for a problem in research designed called the *survivorship bias*.

294. Dr. Janssen next misrepresents the de Vries et al (2014) study as evidence of his claim: As already detailed herein, that study provided both psychotherapy and medicalized transition, and it is not possible to know which of those or other factors were responsible for the observed differences in mental health. As noted within that research report itself: “the positive results may also be attributable to supportive parents, open-minded peers, and the social and financial support (treatment is covered by health insurance) that gender dysphoric individuals can receive in the Netherlands.” Moreover, Dr. de Vries continues to express the very opposite of what Dr. Janssen attributed to her: Writing in 2023, she repeated that “rigorous longitudinal outcomes studies that provide evidence about whether this approach [hormonal interventions in minors] is effective and safe are needed” and that “Future studies that compare outcomes with different care models are needed.” (de Vries 2023 at 276.)

295. Dr. Janssen’s citation of Chen et al (2023) is misleadingly incomplete, and its

scientific short-comings have already been detailed herein: The study did not report whether study participants were receiving psychotherapy along with medical transition (see Section XIII.D. *Failed to Report*), and two people in the Chen study committed suicide.

296. Dr. Janssen claims that “well-established research demonstrates the effectiveness of treatment for gender dysphoria in adolescence,” citing Turban, *et al.*, 2018. Dr. Janssen’s claim misrepresents that source. What Turban, *et al.*, 2018, actually said was that such treatment “has been evaluated in two studies on the same cohort of Dutch adolescents,” explicitly warning that “the results come from only one clinic and concern a highly selected sample...Whether the same positive results can be expected for the larger number of adolescents that are treated at clinics that vary in their approach to gender variant adolescence *has yet to be determined.*” (Turban 2018 at 640, italics added.) Additionally, the Turban citation in turn cites de Vries, *et al.*, 2014, which I have discussed above. I note also that of the nine publications Dr. Janssen cites, three were written by the same author (i.e., Turban, 2018, 2020a, 2020b, signalling the cherry-picked nature of the sources Dr. Janssen has chosen to cite. Moreover, the people in those studies were all cases of childhood-onset gender dysphoria whose dysphoria persisted into adolescence, and the conclusions do not pertain to the very much larger group of adolescent-onset cases. (See Section IX. *Distinct Mental Health Profiles.*)

297. Dr. Janssen discounted the importance of mental health issues among gender dysphoric adolescents because “most psychiatric conditions are highly correlated with other co-occurring psychiatric conditions” (Janssen ¶44). When phrased with terms that vague, the claim is only superficially true. Dr. Janssen’s misrepresentation of the research becomes apparent when the specifics are included: The *pattern* of mental illnesses among gender dysphoric youth is different from the *pattern* of mental illnesses of other adolescents. Dr. Janssen reflects

depression and anxiety (Janssen ¶44), but ignores Autism Spectrum Disorder and Borderline Personality Disorder, which are rare in the general population but highly overrepresented among gender dysphoric youth. (See Section XI. *Mental Health Profiles*.) That is, the epidemiological evidence is in direct conflict with Dr. Janssen’s claims that gender dysphoric youth “are not outliers” (Janssen ¶44) which he finds “unsurprising” (Janssen ¶43). Dr. Janssen has no background in epidemiology and is not qualified to assess what is or is not surprising in epidemiological evidence.

298. After Dr. Janssen acknowledges correlations between gender dysphoria and other mental health conditions, Dr. Janssen proceeds repeatedly to infer causality, all in violation of the scientific method. (See Section IV.B. *Correlation Does Not Imply Causation*.) The correlations between mental illnesses and gender dysphoria would be explained by any of (1) gender dysphoria causing mental illness, (2) mental illness causing gender dysphoria, or (3) some third factor causing both gender dysphoria and mental illness. It is not possible for Dr. Janssen, or anyone else, to know which of these is true. In complete absence of evidence, Dr. Janssen conveys only the explanation he prefers. His declaration does not indicate it merely as a possibility, but asserts it as flatly true and mentions no other possibility. He either misapplies or is entirely unaware of the scientific method for interpreting correlations.

299. Contrary to Dr. Janssen’s claims, it is scientifically invalid to conclude that one can use a mental health assessment “to evaluate *the effect* of those [mental health] conditions” (Janssen ¶45), or “whether medical treatment for gender dysphoria is *necessary*” (Janssen ¶45), or that distress is “*resulting in* co-occurring conditions” (Janssen ¶46), or that “treating the underlying gender dysphoria *is essential* to alleviating the psychological distress” (Janssen ¶45). Each of those terms assert causality, and none can be supported with correlational data, which all

that exists. Dr. Janssen also fails to take his own argument to its own, more parsimonious explanation: It is exactly because adolescents are experiencing many mental health concerns that Adolescent-Onset Gender Dysphoria may simply represent another of those mental health concerns, amenable to mental health treatment, and not require the medical risks and sacrifices of life-long physical interventions.

C. Kingery

300. Dr. Kingery's employment as director of a child and adolescent gender clinic represents a significant conflict of interest: The income she derives from providing medical services to minors would be directly affected by the outcome of this case. Individuals who stand to lose income on the basis of research findings cannot be objective in their assessment of those findings. (See Section I.B. on *Clinical vs. Scientific Expertise* and Section I.C. on the *Professional Standard on Conflict of Interest*.)

301. Dr. Kingery's declaration does not represent the science of medicalized transition of minors. I could not find in her report any citation or mention of the systematic reviews of the science, whether from an international health care system or a professional guild. Other than the WPATH and Endocrine Society guidelines, Dr. Kingery's reported included exactly three citations to the peer-reviewed literature, two of which were unrelated the gender dysphoria (Guaraldi 2016; de Mouson 2020), and one of which described a non-representative survey (Turban 2020). A fourth citation (James 2015) was not peer-reviewed and simply identified the survey used by Turban (2020).

302. Despite the very large number of studies of gender dysphoria, Dr. Kingery claimed to have reviewed six in preparing her report, which she listed in her Exhibit B. None of these six documents were actually cited within her report, however. It not possible to develop an expert

opinion, or even just an informed opinion, on the basis of such a limited selection of the scientific literature. Moreover, this particular set of documents do not provide any meaningful representation of the science of the medicalized transition of minors. The three entries among them that represent outcomes studies are already discussed in detail herein, showing why they do not, in fact, demonstrate that medicalized transition benefits mental health: For Achille, see ¶195; for de Vries, see ¶187–188; and for Tordoff, see ¶196. Rafferty is the policy statement released by the American Academy of Pediatrics. It does not cite *any* of the outcomes on medicalized transition of minors, and the long-series of factual errors it makes are already enumerated in my own peer reviewed article fact-checking its claims, and is included here as Appendix 2. Turban (2020) and Turban (2022) are surveys reporting correlations only.

303. In place of citing the science, Dr. Kingery repeatedly, almost exclusively, cited the WPATH and Endocrine Society guidelines, as if those documents contained evidence supporting her options, which they do not. Dr. Kingery called WPATH and Endocrine Society guidelines “comprehensive” and “based on decades of scientific and medical research” (Kingery ¶25). Her claims are demonstrably false, as detailed herein. (See Section VI. *Endocrine Society, WPATH, and AAP Did Not Conduct Systematic Reviews* and Section XVI. *Assessments of Clinical Guidelines*.) More misleading still, Dr. Kingery presents those policies as conclusive, despite that they each emphasize the tentative nature of their conclusions and the many unknowns. (See Section XII.D. *WPATH Repeatedly Warns of Untested Hypotheses*.)

304. Dr. Kingery extolled the WPATH guidelines, repeatedly deferring to it, to prior versions of it, and to insinuations of long-standing elements backed by long-standing research evidence. Missing from Dr. Kingery’s declaration, however, was that the successive revisions of the guidelines have progressively eroded and removed the safeguards of earlier versions, all in

the absence of evidence supporting such changes.

305. Even before the removal of safeguards in WPATH SOCs, clinics providing medical transition services were already indicating that WPATH guidelines provided insufficient protection. A 1995 survey of such centers found 74% of clinics did not adhere to WPATH standards instead applying *more conservative* standards. (Petersen et al 1995.) For reference, WPATH released version 6 of its “Standards of Care” in 2001, version 7 in 2012, and version 8 in 2022.

306. The criteria of WPATH version 6 included: a DSM diagnosis, indications that hormones will be used responsibly, three months of either psychotherapy or a “real life test” of living as the new sex, increasing consolidation of gender identity during that period, progress in solving life problems, and (for genital surgery) two clinical approval letters, one of which must be a comprehensive psychosocial assessment. The guidelines in version 6 were the subject of a systematic assessment, comparing them against the research evidence, in preparation for the development of version 7. The review included an exhaustive search of the research evidence:

For follow-up studies between 1991 and the present we searched Medline and Embase using the following keywords: “transsexual, gender identity disorder, sex reassignment surgery, follow-up study, regret, standards of care, eligibility criteria.” We made a selection of these follow-up studies, retaining only those papers that contained information “on whom and under what circumstances SRS is effective.” (De Cuypere & Vercrusse 2009 at 195.)

This peer-reviewed assessment was published in the *International Journal of Transgenderism* and concluded:

While there are no randomized controlled clinical trials that prove that SRS is effective and under which conditions, there are sufficient indications in the literature that *if the SOC, and especially the eligibility and readiness criteria for SRS, are adhered to with care*, the individual with GID will feel psychologically better after the SRS than before it. (De Cuypere & Vercrusse 2009 at 195.)

307. Despite that assessment, WPATH’s version 7 did the very opposite: Rather than

emphasize these criteria, version 7 *lowered* the criteria, replacing them with an “informed consent model.” Comprehensive psychosocial assessment was reduced to an assessment demonstrating capacity to provide informed consent. The requirement for psychotherapy or real life test time was reduced to the requirement that any significant mental health concerns (left undefined) be reasonably well-controlled (left undefined).

308. Of central importance was the insertion to version 7 of a pivotal loophole. Whereas version 6 included:

The SOC are intended to provide flexible direction for the treatment of persons with gender identity disorders. When eligibility requirements are stated they are meant to be *minimum requirements*. (WPATH 2002 at 1–2, italics added.)

version 7 instead included:

As for all previous versions of the SOC, the criteria put forth in this document for hormone therapy and surgical treatments for gender dysphoria are clinical guidelines; *individual health professionals and programs may modify them*. (WPATH 2012 at 2, italics added.)

Whereas version 6 permitted clinicians to move criteria *up*, version 7 removed the words “minimum requirements,” now permitting clinicians to move criteria *up or down*. Second, representing an explicit and demonstrable falsehood, version 7 added “As for all previous versions.” This single change, to this single passage, embedded in introductory text, allowing clinicians to change any criterion, removes any claim the document might have to being called “standards” at all. As noted already herein, evaluation of WPATH’s version 7 using standardized criteria received unanimous ratings of “Do not recommend.” (See Section XVI. *WPATH*.)

309. WPATH’s version 8 carried over the language eviscerating their own requirements, allowing clinicians to remove any criterion, and misrepresenting its own history:

The SOC-8 guidelines are intended to be flexible to meet the diverse health care needs of TGD people globally....*As in all previous versions* of the SOC, the criteria put forth in this document for gender-affirming interventions are clinical

guidelines; individual health care *professionals and programs may modify them* in consultation with the TGD person. (WPATH 2022 at S6)

310. It is against this history of now-removed safeguards and permission to remove any remaining safe-guards that the hollowness of Dr. Kingery’s claims become apparent: It doesn’t matter if the WPATH says “it is important to establish the young person has experience several years of persistent gender diversity/incongruence” (Kingery ¶35). Any clinician can “modify” that recommendation merely by consulting with the patient—a patient *already* requesting it. It is meaningless for Dr. Kingery to declare that in her clinic “We follow the process outlined in the WPATH SOC-8” (Kingery ¶42) when the SOC-8 includes permission to ignore any element of that process. WPATH standards are optional, unsupervised, and unenforced. They do not represent standards at all in any meaningful sense of the term.


311. Dr. Kingery reported being trained in pediatric endocrinology, not mental health. She is qualified to assess *physical* outcomes to the extent that the medical interventions had their intended effects on the bodies of her patients, but not their mental health outcomes, which were their actual goals. Despite not being qualified to do so, Dr. Kingery claimed she assesses patients “*physical and mental health*” (Kingery ¶50). Dr. Kingery claimed that puberty blockers “have improved the *physical and mental well-being* of my patients” (Kingery ¶69). She is not qualified to draw these conclusions. Dr. Kingery’s observations of changes in “anxiety, depression, suicidality and self-harming behaviors” (Kingery ¶73) are all outside her expertise. Dr. Kingery’s confidence in the success of the treatments she provides is not reflected in any of the systematic reviews employing objective methods to assess success, and Dr. Kingery documents no evidence of being aware of them.

312. Dr. Kingery’s predictions of emotional and psychological harm should SB-150 be implemented are outside her expertise, and she asserted them without reference to any evidence

in the research literature. Moreover, Dr. Kingery's prediction has also failed to manifest in other jurisdictions. As detailed herein (see Section II. *Multiple International Health Care Systems*), several whole European countries have already ended the medicalized transition of minors (see Section II. *International Health Care Systems*), exempting only formal research studies, consistent with their experimental nature, and none has reported the dire outcomes Dr. Kingery predicts.

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

Executed on 2023-Jun-9.


James M. Cantor, Ph.D.

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List of Appendices

Appendix 1

Curriculum Vita

Appendix 2

Cantor, J. M. (2020). Transgender and gender diverse children and adolescents: Fact-checking of AAP policy. *Journal of Sex & Marital Therapy*, 46, 307–313. doi: 10.1080/0092623X.2019.1698481

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EDUCATION

Postdoctoral Fellowship Centre for Addiction and Mental Health • Toronto, Canada	Jan., 2000–May, 2004
Doctor of Philosophy Psychology • McGill University • Montréal, Canada	Sep., 1993–Jun., 2000
Master of Arts Psychology • Boston University • Boston, MA	Sep., 1990–Jan., 1992
Bachelor of Science Interdisciplinary Science • Rensselaer Polytechnic Institute • Troy, NY Concentrations: Computer science, mathematics, physics	Sep. 1984–Aug., 1988

EMPLOYMENT HISTORY

Director Toronto Sexuality Centre • Toronto, Canada	Feb., 2017–Present
Senior Scientist (Inaugural Member) Campbell Family Mental Health Research Institute Centre for Addiction and Mental Health • Toronto, Canada	Aug., 2012–May, 2018
Senior Scientist Complex Mental Illness Program Centre for Addiction and Mental Health • Toronto, Canada	Jan., 2012–May, 2018
Head of Research Sexual Behaviours Clinic Centre for Addiction and Mental Health • Toronto, Canada	Nov., 2010–Apr. 2014
Research Section Head Law & Mental Health Program Centre for Addiction and Mental Health • Toronto, Canada	Dec., 2009–Sep. 2012
Psychologist Law & Mental Health Program Centre for Addiction and Mental Health • Toronto, Canada	May, 2004–Dec., 2011

Clinical Psychology Intern Sep., 1998–Aug., 1999
Centre for Addiction and Mental Health • Toronto, Canada

Teaching Assistant Sep., 1993–May, 1998
Department of Psychology
McGill University • Montréal, Canada

Pre-Doctoral Practicum Sep., 1993–Jun., 1997
Sex and Couples Therapy Unit
Royal Victoria Hospital • Montréal, Canada

Pre-Doctoral Practicum May, 1994–Dec., 1994
Department of Psychiatry
Queen Elizabeth Hospital • Montréal, Canada

ACADEMIC APPOINTMENTS

Associate Professor Jul., 2010–May, 2019
Department of Psychiatry
University of Toronto Faculty of Medicine • Toronto, Canada

Adjunct Faculty Aug. 2013–Jun., 2018
Graduate Program in Psychology
York University • Toronto, Canada

Associate Faculty (Hon) Oct., 2017–Dec., 2017
School of Behavioural, Cognitive & Social Science
University of New England • Armidale, Australia

Assistant Professor Jun., 2005–Jun., 2010
Department of Psychiatry
University of Toronto Faculty of Medicine • Toronto, Canada

Adjunct Faculty Sep., 2004–Jun., 2010
Clinical Psychology Residency Program
St. Joseph's Healthcare • Hamilton, Canada

PUBLICATIONS

1. Cantor, J. M. (2023). Paraphilia, gender dysphoria, and hypersexuality. In R. F. Krueger & P. H. Blaney (Eds.), *Oxford textbook of psychopathology* (4th ed.) (pp. 549–575). New York: Oxford University Press.
2. Cantor, J. M. (2020). Transgender and gender diverse children and adolescents: Fact-checking of AAP policy. *Journal of Sex & Marital Therapy, 46*, 307–313. doi: 10.1080/0092623X.2019.1698481
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4. Stephens, S., Seto, M. C., Cantor, J. M., & Lalumière, M. L. (2019). The Screening Scale for Pedophilic Interest-Revised (SSPI-2) may be a measure of pedohebephilia. *Journal of Sexual Medicine, 16*, 1655–1663. doi: 10.1016/j.jsxm.2019.07.015
5. McPhail, I. V., Hermann, C. A., Fernane, S., Fernandez, Y. M., Nunes, K. L., & Cantor, J. M. (2019). Validity in phallometric testing for sexual interests in children: A meta-analytic review. *Assessment, 26*, 535–551. doi: 10.1177/1073191117706139
6. Cantor, J. M. (2018). Can pedophiles change? *Current Sexual Health Reports, 10*, 203–206. doi: 10.1007/s11930-018-0165-2
7. Cantor, J. M., & Fedoroff, J. P. (2018). Can pedophiles change? Response to opening arguments and conclusions. *Current Sexual Health Reports, 10*, 213–220. doi: 10.1007/s11930-018-0167-0z
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9. Stephens, S., Seto, M. C., Goodwill, A. M., & Cantor, J. M. (2018). The relationships between victim age, gender, and relationship polymorphism and sexual recidivism. *Sexual Abuse, 30*, 132–146. doi: 10.1177/1079063216630983
10. Stephens, S., Newman, J. E., Cantor, J. M., & Seto, M. C. (2018). The Static-99R predicts sexual and violent recidivism for individuals with low intellectual functioning. *Journal of Sexual Aggression, 24*, 1–11. doi: 10.1080/13552600.2017.1372936
11. Cantor, J. M. (2017). Sexual deviance or social deviance: What MRI research reveals about pedophilia. *ATSA Forum, 29*(2). Association for the Treatment of Sexual Abusers. Beaverton, OR. <http://newsmanager.commpartners.com/atsa/issues/2017-03-15/2.html>
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16. Stephens, S., Cantor, J. M., Goodwill, A. M., & Seto, M. C. (2017). Multiple indicators of sexual interest in prepubescent or pubescent children as predictors of sexual recidivism. *Journal of Consulting and Clinical Psychology*, *85*, 585–595. doi: 10.1037/ccp0000194
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65. Pilkington, N. W., & Cantor, J. M. (1996). Perceptions of heterosexual bias in professional psychology programs: A survey of graduate students. *Professional Psychology: Research and Practice, 27*, 604–612.

PUBLICATIONS

LETTERS AND COMMENTARIES

1. Cantor, J. M. (2015). Research methods, statistical analysis, and the phallometric test for hebephilia: Response to Fedoroff [Editorial Commentary]. *Journal of Sexual Medicine*, *12*, 2499–2500. doi: 10.1111/jsm.13040
2. Cantor, J. M. (2015). In his own words: Response to Moser [Editorial Commentary]. *Journal of Sexual Medicine*, *12*, 2502–2503. doi: 10.1111/jsm.13075
3. Cantor, J. M. (2015). Purported changes in pedophilia as statistical artefacts: Comment on Müller et al. (2014). *Archives of Sexual Behavior*, *44*, 253–254. doi: 10.1007/s10508-014-0343-x
4. McPhail, I. V., & Cantor, J. M. (2015). Pedophilia, height, and the magnitude of the association: A research note. *Deviant Behavior*, *36*, 288–292. doi: 10.1080/01639625.2014.935644
5. Soh, D. W., & Cantor, J. M. (2015). A peek inside a furry convention [Letter to the Editor]. *Archives of Sexual Behavior*, *44*, 1–2. doi: 10.1007/s10508-014-0423-y
6. Cantor, J. M. (2012). Reply to Italiano's (2012) comment on Cantor (2011) [Letter to the Editor]. *Archives of Sexual Behavior*, *41*, 1081–1082. doi: 10.1007/s10508-012-0011-y
7. Cantor, J. M. (2012). The errors of Karen Franklin's *Pretextuality* [Commentary]. *International Journal of Forensic Mental Health*, *11*, 59–62. doi: 10.1080/14999013.2012.672945
8. Cantor, J. M., & Blanchard, R. (2012). White matter volumes in pedophiles, hebephiles, and teleiophiles [Letter to the Editor]. *Archives of Sexual Behavior*, *41*, 749–752. doi: 10.1007/s10508-012-9954-2
9. Cantor, J. M. (2011). New MRI studies support the Blanchard typology of male-to-female transsexualism [Letter to the Editor]. *Archives of Sexual Behavior*, *40*, 863–864. doi: 10.1007/s10508-011-9805-6
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11. Cantor, J. M. (2003, Summer). Review of the book *The Man Who Would Be Queen* by J. Michael Bailey. *Newsletter of Division 44 of the American Psychological Association*, *19*(2), 6.
12. Cantor, J. M. (2003, Spring). What are the hot topics in LGBT research in psychology? *Newsletter of Division 44 of the American Psychological Association*, *19*(1), 21–24.
13. Cantor, J. M. (2002, Fall). Male homosexuality, science, and pedophilia. *Newsletter of Division 44 of the American Psychological Association*, *18*(3), 5–8.
14. Cantor, J. M. (2000). Review of the book *Sexual Addiction: An Integrated Approach*. *Journal of Sex and Marital Therapy*, *26*, 107–109.

EDITORIALS

1. Cantor, J. M. (2012). Editorial. *Sexual Abuse: A Journal of Research and Treatment*, *24*.

2. Cantor, J. M. (2011). Editorial note. *Sexual Abuse: A Journal of Research and Treatment*, 23, 414.
3. Barbaree, H. E., & Cantor, J. M. (2010). Performance indicators for *Sexual Abuse: A Journal of Research and Treatment* (SAJRT) [Editorial]. *Sexual Abuse: A Journal of Research and Treatment*, 22, 371–373.
4. Barbaree, H. E., & Cantor, J. M. (2009). *Sexual Abuse: A Journal of Research and Treatment* performance indicators for 2007 [Editorial]. *Sexual Abuse: A Journal of Research and Treatment*, 21, 3–5.
5. Zucker, K. J., & Cantor, J. M. (2009). Cruising: Impact factor data [Editorial]. *Archives of Sexual Research*, 38, 878–882.
6. Barbaree, H. E., & Cantor, J. M. (2008). Performance indicators for *Sexual Abuse: A Journal of Research and Treatment* [Editorial]. *Sexual Abuse: A Journal of Research and Treatment*, 20, 3–4.
7. Zucker, K. J., & Cantor, J. M. (2008). The *Archives* in the era of online first ahead of print [Editorial]. *Archives of Sexual Behavior*, 37, 512–516.
8. Zucker, K. J., & Cantor, J. M. (2006). The impact factor: The *Archives* breaks from the pack [Editorial]. *Archives of Sexual Behavior*, 35, 7–9.
9. Zucker, K. J., & Cantor, J. M. (2005). The impact factor: “Goin’ up” [Editorial]. *Archives of Sexual Behavior*, 34, 7–9.
10. Zucker, K., & Cantor, J. M. (2003). The numbers game: The impact factor and all that jazz [Editorial]. *Archives of Sexual Behavior*, 32, 3–5.

FUNDING HISTORY

Principal Investigators: Doug VanderLaan, Meng-Chuan Lai
Co-Investigators: James M. Cantor, Megha Mallar Chakravarty, Nancy Lobaugh, M. Palmert, M. Skorska
Title: *Brain function and connectomics following sex hormone treatment in adolescents experience gender dysphoria*
Agency: Canadian Institutes of Health Research (CIHR), Behavioural Sciences-B-2
Funds: \$650,250 / 5 years (July, 2018)

Principal Investigator: Michael C. Seto
Co-Investigators: Martin Lalumière , James M. Cantor
Title: *Are connectivity differences unique to pedophilia?*
Agency: University Medical Research Fund, Royal Ottawa Hospital
Funds: \$50,000 / 1 year (January, 2018)

Principal Investigator: Lori Brotto
Co-Investigators: Anthony Bogaert, James M. Cantor, Gerulf Rieger
Title: *Investigations into the neural underpinnings and biological correlates of asexuality*
Agency: Natural Sciences and Engineering Research Council (NSERC), Discovery Grants Program
Funds: \$195,000 / 5 years (April, 2017)

Principal Investigator: Doug VanderLaan
Co-Investigators: Jerald Bain, James M. Cantor, Megha Mallar Chakravarty, Sofia Chavez, Nancy Lobaugh, and Kenneth J. Zucker
Title: *Effects of sex hormone treatment on brain development: A magnetic resonance imaging study of adolescents with gender dysphoria*
Agency: Canadian Institutes of Health Research (CIHR), Transitional Open Grant Program
Funds: \$952,955 / 5 years (September, 2015)

Principal Investigator: James M. Cantor
Co-Investigators: Howard E. Barbaree, Ray Blanchard, Robert Dickey, Todd A. Girard, Phillip E. Klassen, and David J. Mikulis
Title: *Neuroanatomic features specific to pedophilia*
Agency: Canadian Institutes of Health Research (CIHR)
Funds: \$1,071,920 / 5 years (October, 2008)

Principal Investigator: James M. Cantor
Title: *A preliminary study of fMRI as a diagnostic test of pedophilia*
Agency: Dean of Medicine New Faculty Grant Competition, Univ. of Toronto
Funds: \$10,000 (July, 2008)

Principal Investigator: James M. Cantor
Co-Investigator: Ray Blanchard
Title: *Morphological and neuropsychological correlates of pedophilia*
Agency: Canadian Institutes of Health Research (CIHR)
Funds: \$196,902 / 3 years (April, 2006)

KEYNOTE AND INVITED ADDRESSES

1. Cantor, J. M. (2022, December 5). The science of gender dysphoria and transgenderism. Lund University, Latvia. <https://files.fm/f/4bzznufvb>
2. Cantor, J. M. (2021, September 28). *No topic too tough for this expert panel: A year in review*. Plenary Session for the 40th Annual Research and Treatment Conference, Association for the Treatment of Sexual Abusers.
3. Cantor, J. M. (2019, May 1). *Introduction and Q&A for 'I, Pedophile.'* StopSO 2nd Annual Conference, London, UK.
4. Cantor, J. M. (2018, August 29). *Neurobiology of pedophilia or paraphilia? Towards a 'Grand Unified Theory' of sexual interests*. Keynote address to the International Association for the Treatment of Sexual Offenders, Vilnius, Lithuania.
5. Cantor, J. M. (2018, August 29). *Pedophilia and the brain: Three questions asked and answered*. Preconference training presented to the International Association for the Treatment of Sexual Offenders, Vilnius, Lithuania.
6. Cantor, J. M. (2018, April 13). *The responses to I, Pedophile from We, the people*. Keynote address to the Minnesota Association for the Treatment of Sexual Abusers, Minneapolis, Minnesota.
7. Cantor, J. M. (2018, April 11). *Studying atypical sexualities: From vanilla to I, Pedophile*. Full day workshop at the Minnesota Association for the Treatment of Sexual Abusers, Minneapolis, Minnesota.
8. Cantor, J. M. (2018, January 20). *How much sex is enough for a happy life?* Invited lecture to the University of Toronto Division of Urology Men's Health Summit, Toronto, Canada.
9. Cantor, J. M. (2017, November 2). Pedophilia as a phenomenon of the brain: Update of evidence and the public response. Invited presentation to the 7th annual SBC education event, Centre for Addiction and Mental Health, Toronto, Canada.
10. Cantor, J. M. (2017, June 9). Pedophilia being in the brain: The evidence and the public's reaction. Invited presentation to *SEXposium at the ROM: The science of love and sex*, Toronto, Canada.
11. Cantor, J. M., & Campea, M. (2017, April 20). *"I, Pedophile" showing and discussion*. Invited presentation to the 42nd annual meeting of the Society for Sex Therapy and Research, Montréal, Canada.
12. Cantor, J. M. (2017, March 1). *Functional and structural neuroimaging of pedophilia: Consistencies across methods and modalities*. Invited lecture to the Brain Imaging Centre, Royal Ottawa Hospital, Ottawa, Canada.
13. Cantor, J. M. (2017, January 26). *Pedophilia being in the brain: The evidence and the public reaction*. Inaugural keynote address to the University of Toronto Sexuality Interest Network, Toronto, Ontario, Canada.
14. Cantor, J. M. (2016, October 14). *Discussion of CBC's "I, Pedophile."* Office of the Children's Lawyer Educational Session, Toronto, Ontario, Canada.
15. Cantor, J. M. (2016, September 15). *Evaluating the risk to reoffend: What we know and what we don't*. Invited lecture to the Association of Ontario Judges, Ontario Court of Justice Annual Family Law Program, Blue Mountains, Ontario, Canada. [Private link only: <https://vimeo.com/239131108/3387c80652>]
16. Cantor, J. M. (2016, April 8). *Pedophilia and the brain: Conclusions from the second*

- generation of research*. Invited lecture at the 10th annual Risk and Recovery Forensic Conference, Hamilton, Ontario.
17. Cantor, J. M. (2016, April 7). *Hypersexuality without the hyperbole*. Keynote address to the 10th annual Risk and Recovery Forensic Conference, Hamilton, Ontario.
 18. Cantor, J. M. (2015, November). *No one asks to be sexually attracted to children: Living in Daniel's World*. Grand Rounds, Centre for Addiction and Mental Health. Toronto, Canada.
 19. Cantor, J. M. (2015, August). *Hypersexuality: Getting past whether "it" is or "it" isn't*. Invited address at the 41st annual meeting of the International Academy of Sex Research. Toronto, Canada.
 20. Cantor, J. M. (2015, July). *A unified theory of typical and atypical sexual interest in men: Paraphilia, hypersexuality, asexuality, and vanilla as outcomes of a single, dual opponent process*. Invited presentation to the 2015 Puzzles of Sexual Orientation conference, Lethbridge, AL, Canada.
 21. Cantor, J. M. (2015, June). *Hypersexuality*. Keynote Address to the Ontario Problem Gambling Provincial Forum. Toronto, Canada.
 22. Cantor, J. M. (2015, May). *Assessment of pedophilia: Past, present, future*. Keynote Address to the International Symposium on Neural Mechanisms Underlying Pedophilia and Child Sexual Abuse (NeMUP). Berlin, Germany.
 23. Cantor, J. M. (2015, March). *Prevention of sexual abuse by tackling the biggest stigma of them all: Making sex therapy available to pedophiles*. Keynote address to the 40th annual meeting of the Society for Sex Therapy and Research, Boston, MA.
 24. Cantor, J. M. (2015, March). *Pedophilia: Predisposition or perversion?* Panel discussion at Columbia University School of Journalism. New York, NY.
 25. Cantor, J. M. (2015, February). *Hypersexuality*. Research Day Grand Rounds presentation to Ontario Shores Centre for Mental Health Sciences, Whitby, Ontario, Canada.
 26. Cantor, J. M. (2015, January). *Brain research and pedophilia: What it means for assessment, research, and policy*. Keynote address to the inaugural meeting of the Netherlands Association for the Treatment of Sexual Abusers, Utrecht, Netherlands.
 27. Cantor, J. M. (2014, December). *Understanding pedophilia and the brain: Implications for safety and society*. Keynote address for The Jewish Community Confronts Violence and Abuse: Crisis Centre for Religious Women, Jerusalem, Israel.
 28. Cantor, J. M. (2014, October). *Understanding pedophilia & the brain*. Invited full-day workshop for the Sex Offender Assessment Board of Pennsylvania, Harrisburg, PA.
 29. Cantor, J. M. (2014, September). *Understanding neuroimaging of pedophilia: Current status and implications*. Invited lecture presented to the Mental Health and Addition Rounds, St. Joseph's Healthcare, Hamilton, Ontario, Canada.
 30. Cantor, J. M. (2014, June). *An evening with Dr. James Cantor*. Invited lecture presented to the Ontario Medical Association, District 11 Doctors' Lounge Program, Toronto, Ontario, Canada.
 31. Cantor, J. M. (2014, April). *Pedophilia and the brain*. Invited lecture presented to the University of Toronto Medical Students lunchtime lecture. Toronto, Ontario, Canada.
 32. Cantor, J. M. (2014, February). *Pedophilia and the brain: Recap and update*. Workshop presented at the 2014 annual meeting of the Washington State Association for the Treatment of Sexual Abusers, Cle Elum, WA.

33. Cantor, J. M., Lafaille, S., Hannah, J., Kucyi, A., Soh, D., Girard, T. A., & Mikulis, D. M. (2014, February). *Functional connectivity in pedophilia*. Neuropsychiatry Rounds, Toronto Western Hospital, Toronto, Ontario, Canada.
34. Cantor, J. M. (2013, November). *Understanding pedophilia and the brain: The basics, the current status, and their implications*. Invited lecture to the Forensic Psychology Research Centre, Carleton University, Ottawa, Canada.
35. Cantor, J. M. (2013, November). *Mistaking puberty, mistaking hebephilia*. Keynote address presented to the 32nd annual meeting of the Association for the Treatment of Sexual Abusers, Chicago, IL.
36. Cantor, J. M. (2013, October). *Understanding pedophilia and the brain: A recap and update*. Invited workshop presented at the 32nd annual meeting of the Association for the Treatment of Sexual Abusers, Chicago, IL.
37. Cantor, J. M. (2013, October). *Compulsive-hyper-sex-addiction: I don't care what we all it, what can we do?* Invited address presented to the Board of Examiners of Sex Therapists and Counselors of Ontario, Toronto, Ontario, Canada.
38. Cantor, J. M. (2013, September). *Neuroimaging of pedophilia: Current status and implications*. McGill University Health Centre, Department of Psychiatry Grand Rounds presentation, Montréal, Québec, Canada.
39. Cantor, J. M. (2013, April). *Understanding pedophilia and the brain*. Invited workshop presented at the 2013 meeting of the Minnesota Association for the Treatment of Sexual Abusers, Minneapolis, MN.
40. Cantor, J. M. (2013, April). *The neurobiology of pedophilia and its implications for assessment, treatment, and public policy*. Invited lecture at the 38th annual meeting of the Society for Sex Therapy and Research, Baltimore, MD.
41. Cantor, J. M. (2013, April). *Sex offenders: Relating research to policy*. Invited roundtable presentation at the annual meeting of the Academy of Criminal Justice Sciences, Dallas, TX.
42. Cantor, J. M. (2013, March). *Pedophilia and brain research: From the basics to the state-of-the-art*. Invited workshop presented to the annual meeting of the Forensic Mental Health Association of California, Monterey, CA.
43. Cantor, J. M. (2013, January). *Pedophilia and child molestation*. Invited lecture presented to the Canadian Border Services Agency, Toronto, Ontario, Canada.
44. Cantor, J. M. (2012, November). *Understanding pedophilia and sexual offenders against children: Neuroimaging and its implications for public safety*. Invited guest lecture to University of New Mexico School of Medicine Health Sciences Center, Albuquerque, NM.
45. Cantor, J. M. (2012, November). *Pedophilia and brain research*. Invited guest lecture to the annual meeting of the Circles of Support and Accountability, Toronto, Ontario, Canada.
46. Cantor, J. M. (2012, January). *Current findings on pedophilia brain research*. Invited workshop at the San Diego International Conference on Child and Family Maltreatment, San Diego, CA.
47. Cantor, J. M. (2012, January). *Pedophilia and the risk to re-offend*. Invited lecture to the Ontario Court of Justice Judicial Development Institute, Toronto, Ontario, Canada.
48. Cantor, J. M. (2011, November). *Pedophilia and the brain: What it means for assessment, treatment, and policy*. Plenary Lecture presented at the Association for the Treatment of Sexual Abusers, Toronto, Ontario, Canada.

49. Cantor, J. M. (2011, July). *Towards understanding contradictory findings in the neuroimaging of pedophilic men*. Keynote address to 7th annual conference on Research in Forensic Psychiatry, Regensburg, Germany.
50. Cantor, J. M. (2011, March). *Understanding sexual offending and the brain: Brain basics to the state of the art*. Workshop presented at the winter conference of the Oregon Association for the Treatment of Sexual Abusers, Oregon City, OR.
51. Cantor, J. M. (2010, October). *Manuscript publishing for students*. Workshop presented at the 29th annual meeting of the Association for the Treatment of Sexual Abusers, Phoenix, AZ.
52. Cantor, J. M. (2010, August). *Is sexual orientation a paraphilia?* Invited lecture at the International Behavioral Development Symposium, Lethbridge, Alberta, Canada.
53. Cantor, J. M. (2010, March). *Understanding sexual offending and the brain: From the basics to the state of the art*. Workshop presented at the annual meeting of the Washington State Association for the Treatment of Sexual Abusers, Blaine, WA.
54. Cantor, J. M. (2009, January). *Brain structure and function of pedophilia men*. Neuropsychiatry Rounds, Toronto Western Hospital, Toronto, Ontario.
55. Cantor, J. M. (2008, April). *Is pedophilia caused by brain dysfunction?* Invited address to the University-wide Science Day Lecture Series, SUNY Oswego, Oswego, NY.
56. Cantor, J. M., Kabani, N., Christensen, B. K., Zipursky, R. B., Barbaree, H. E., Dickey, R., Klassen, P. E., Mikulis, D. J., Kuban, M. E., Blak, T., Richards, B. A., Hanratty, M. K., & Blanchard, R. (2006, September). *MRIs of pedophilic men*. Invited presentation at the 25th annual meeting of the Association for the Treatment of Sexual Abusers, Chicago.
57. Cantor, J. M., Blanchard, R., & Christensen, B. K. (2003, March). *Findings in and implications of neuropsychology and epidemiology of pedophilia*. Invited lecture at the 28th annual meeting of the Society for Sex Therapy and Research, Miami.
58. Cantor, J. M., Christensen, B. K., Klassen, P. E., Dickey, R., & Blanchard, R. (2001, July). *Neuropsychological functioning in pedophiles*. Invited lecture presented at the 27th annual meeting of the International Academy of Sex Research, Bromont, Canada.
59. Cantor, J. M., Blanchard, R., Christensen, B., Klassen, P., & Dickey, R. (2001, February). *First glance at IQ, memory functioning and handedness in sex offenders*. Lecture presented at the Forensic Lecture Series, Centre for Addiction and Mental Health, Toronto, Ontario, Canada.
60. Cantor, J. M. (1999, November). *Reversal of SSRI-induced male sexual dysfunction: Suggestions from an animal model*. Grand Rounds presentation at the Allan Memorial Institute, Royal Victoria Hospital, Montréal, Canada.

PAPER PRESENTATIONS AND SYMPOSIA

1. Cantor, J. M. (2020, April). "I'd rather have a trans kid than a dead kid": Critical assessment of reported rates of suicidality in trans kids. *Paper presented at the annual meeting of the Society for the Sex Therapy and Research*. Online in lieu of in person meeting.
2. Stephens, S., Lalumière, M., Seto, M. C., & Cantor, J. M. (2017, October). *The relationship between sexual responsiveness and sexual exclusivity in phallometric profiles*. Paper presented at the annual meeting of the Canadian Sex Research Forum, Fredericton, New Brunswick, Canada.
3. Stephens, S., Cantor, J. M., & Seto, M. C. (2017, March). *Can the SSPI-2 detect hebephilic sexual interest?* Paper presented at the annual meeting of the American-Psychology Law Society Annual Meeting, Seattle, WA.
4. Stephens, S., Seto, M. C., Goodwill, A. M., & Cantor, J. M. (2015, October). *Victim choice polymorphism and recidivism*. Symposium Presentation. Paper presented at the 34th annual meeting of the Association for the Treatment of Sexual Abusers, Montréal, Canada.
5. McPhail, I. V., Hermann, C. A., Fernane, S. Fernandez, Y., Cantor, J. M., & Nunes, K. L. (2014, October). *Sexual deviance in sexual offenders against children: A meta-analytic review of phallometric research*. Paper presented at the 33rd annual meeting of the Association for the Treatment of Sexual Abusers, San Diego, CA.
6. Stephens, S., Seto, M. C., Cantor, J. M., & Goodwill, A. M. (2014, October). *Is hebephilic sexual interest a criminogenic need?: A large scale recidivism study*. Paper presented at the 33rd annual meeting of the Association for the Treatment of Sexual Abusers, San Diego, CA.
7. Stephens, S., Seto, M. C., Cantor, J. M., & Lalumière, M. (2014, October). *Development and validation of the Revised Screening Scale for Pedophilic Interests (SSPI-2)*. Paper presented at the 33rd annual meeting of the Association for the Treatment of Sexual Abusers, San Diego, CA.
8. Cantor, J. M., Lafaille, S., Hannah, J., Kucyi, A., Soh, D., Girard, T. A., & Mikulis, D. M. (2014, September). *Pedophilia and the brain: White matter differences detected with DTI*. Paper presented at the 13th annual meeting of the International Association for the Treatment of Sexual Abusers, Porto, Portugal.
9. Stephens, S., Seto, M., Cantor, J. M., Goodwill, A. M., & Kuban, M. (2014, March). *The role of hebephilic sexual interests in sexual victim choice*. Paper presented at the annual meeting of the American Psychology and Law Society, New Orleans, LA.
10. McPhail, I. V., Fernane, S. A., Hermann, C. A., Fernandez, Y. M., Nunes, K. L., & Cantor, J. M. (2013, November). *Sexual deviance and sexual recidivism in sexual offenders against children: A meta-analysis*. Paper presented at the 32nd annual meeting of the Association for the Treatment of Sexual Abusers, Chicago, IL.
11. Cantor, J. M. (2013, September). *Pedophilia and the brain: Current MRI research and its implications*. Paper presented at the 21st annual World Congress for Sexual Health, Porto Alegre, Brazil. [Featured among Best Abstracts, top 10 of 500.]
12. Cantor, J. M. (Chair). (2012, March). *Innovations in sex research*. Symposium conducted at the 37th annual meeting of the Society for Sex Therapy and Research, Chicago.
13. Cantor, J. M., & Blanchard, R. (2011, August). fMRI versus phallometry in the diagnosis of pedophilia and hebephilia. In J. M. Cantor (Chair), *Neuroimaging of men's object*

- preferences*. Symposium presented at the 37th annual meeting of the International Academy of Sex Research, Los Angeles, USA.
14. Cantor, J. M. (Chair). (2011, August). *Neuroimaging of men's object preferences*. Symposium conducted at the 37th annual meeting of the International Academy of Sex Research, Los Angeles.
 15. Cantor, J. M. (2010, October). A meta-analysis of neuroimaging studies of male sexual arousal. In S. Stolerú (Chair), *Brain processing of sexual stimuli in pedophilia: An application of functional neuroimaging*. Symposium presented at the 29th annual meeting of the Association for the Treatment of Sexual Abusers, Phoenix, AZ.
 16. Chivers, M. L., Seto, M. C., Cantor, J. C., Grimbos, T., & Roy, C. (April, 2010). *Psychophysiological assessment of sexual activity preferences in women*. Paper presented at the 35th annual meeting of the Society for Sex Therapy and Research, Boston, USA.
 17. Cantor, J. M., Girard, T. A., & Lovett-Barron, M. (2008, November). *The brain regions that respond to erotica: Sexual neuroscience for dummies*. Paper presented at the 51st annual meeting of the Society for the Scientific Study of Sexuality, San Juan, Puerto Rico.
 18. Barbaree, H., Langton, C., Blanchard, R., & Cantor, J. M. (2007, October). *The role of age-at-release in the evaluation of recidivism risk of sexual offenders*. Paper presented at the 26th annual meeting of the Association for the Treatment of Sexual Abusers, San Diego.
 19. Cantor, J. M., Kabani, N., Christensen, B. K., Zipursky, R. B., Barbaree, H. E., Dickey, R., Klassen, P. E., Mikulis, D. J., Kuban, M. E., Blak, T., Richards, B. A., Hanratty, M. K., & Blanchard, R. (2006, July). *Pedophilia and brain morphology*. Abstract and paper presented at the 32nd annual meeting of the International Academy of Sex Research, Amsterdam, Netherlands.
 20. Seto, M. C., Cantor, J. M., & Blanchard, R. (2006, March). *Child pornography offending is a diagnostic indicator of pedophilia*. Paper presented at the 2006 annual meeting of the American Psychology-Law Society Conference, St. Petersburg, Florida.
 21. Blanchard, R., Cantor, J. M., Bogaert, A. F., Breedlove, S. M., & Ellis, L. (2005, August). *Interaction of fraternal birth order and handedness in the development of male homosexuality*. Abstract and paper presented at the International Behavioral Development Symposium, Minot, North Dakota.
 22. Cantor, J. M., & Blanchard, R. (2005, July). *Quantitative reanalysis of aggregate data on IQ in sexual offenders*. Abstract and poster presented at the 31st annual meeting of the International Academy of Sex Research, Ottawa, Canada.
 23. Cantor, J. M. (2003, August). *Sex reassignment on demand: The clinician's dilemma*. Paper presented at the 111th annual meeting of the American Psychological Association, Toronto, Canada.
 24. Cantor, J. M. (2003, June). *Meta-analysis of VIQ-PIQ differences in male sex offenders*. Paper presented at the Harvey Stancer Research Day, Toronto, Ontario, Canada.
 25. Cantor, J. M. (2002, August). *Gender role in autogynephilic transsexuals: The more things change...* Paper presented at the 110th annual meeting of the American Psychological Association, Chicago.

26. Cantor, J. M., Christensen, B. K., Klassen, P. E., Dickey, R., & Blanchard, R. (2001, June). *IQ, memory functioning, and handedness in male sex offenders*. Paper presented at the Harvey Stancer Research Day, Toronto, Ontario, Canada.
27. Cantor, J. M. (1998, August). *Convention orientation for lesbian, gay, and bisexual students*. Papers presented at the 106th annual meeting of the American Psychological Association.
28. Cantor, J. M. (1997, August). *Discussion hour for lesbian, gay, and bisexual students*. Presented at the 105th annual meeting of the American Psychological Association.
29. Cantor, J. M. (1997, August). *Convention orientation for lesbian, gay, and bisexual students*. Paper presented at the 105th annual meeting of the American Psychological Association.
30. Cantor, J. M. (1996, August). *Discussion hour for lesbian, gay, and bisexual students*. Presented at the 104th annual meeting of the American Psychological Association.
31. Cantor, J. M. (1996, August). *Symposium: Question of inclusion: Lesbian and gay psychologists and accreditation*. Paper presented at the 104th annual meeting of the American Psychological Association, Toronto.
32. Cantor, J. M. (1996, August). *Convention orientation for lesbian, gay, and bisexual students*. Papers presented at the 104th annual meeting of the American Psychological Association.
33. Cantor, J. M. (1995, August). *Discussion hour for lesbian, gay, and bisexual students*. Presented at the 103rd annual meeting of the American Psychological Association.
34. Cantor, J. M. (1995, August). *Convention orientation for lesbian, gay, and bisexual students*. Papers presented at the 103rd annual meeting of the American Psychological Association.
35. Cantor, J. M. (1994, August). *Discussion hour for lesbian, gay, and bisexual students*. Presented at the 102nd annual meeting of the American Psychological Association.
36. Cantor, J. M. (1994, August). *Convention orientation for lesbian, gay, and bisexual students*. Papers presented at the 102nd annual meeting of the American Psychological Association.
37. Cantor, J. M., & Pilkington, N. W. (1992, August). *Homophobia in psychology programs: A survey of graduate students*. Paper presented at the Centennial Convention of the American Psychological Association, Washington, DC. (ERIC Document Reproduction Service No. ED 351 618)
38. Cantor, J. M. (1991, August). *Being gay and being a graduate student: Double the memberships, four times the problems*. Paper presented at the 99th annual meeting of the American Psychological Association, San Francisco.

POSTER PRESENTATIONS

1. Klein, L., Stephens, S., Goodwill, A. M., Cantor, J. M., & Seto, M. C. (2015, October). *The psychological propensities of risk in undetected sexual offenders*. Poster presented at the 34th annual meeting of the Association for the Treatment of Sexual Abusers, Montréal, Canada.
2. Pullman, L. E., Stephens, S., Seto, M. C., Goodwill, A. M., & Cantor, J. M. (2015, October). *Why are incest offenders less likely to recidivate?* Poster presented at the 34th annual meeting of the Association for the Treatment of Sexual Abusers, Montréal, Canada.
3. Seto, M. C., Stephens, S. M., Cantor, J. M., Lalumiere, M. L., Sandler, J. C., & Freeman, N. A. (2015, August). *The development and validation of the Revised Screening Scale for Pedophilic Interests (SSPI-2)*. Poster presentation at the 41st annual meeting of the International Academy of Sex Research. Toronto, Canada.
4. Soh, D. W., & Cantor, J. M. (2015, August). *A peek inside a furry convention*. Poster presentation at the 41st annual meeting of the International Academy of Sex Research. Toronto, Canada.
5. VanderLaan, D. P., Lobaugh, N. J., Chakravarty, M. M., Patel, R., Chavez, S. Stojanovski, S. O., Takagi, A., Hughes, S. K., Wasserman, L., Bain, J., Cantor, J. M., & Zucker, K. J. (2015, August). *The neurohormonal hypothesis of gender dysphoria: Preliminary evidence of cortical surface area differences in adolescent natal females*. Poster presentation at the 31st annual meeting of the International Academy of Sex Research. Toronto, Canada.
6. Cantor, J. M., Lafaille, S. J., Moayedi, M., Mikulis, D. M., & Girard, T. A. (2015, June). *Diffusion tensor imaging (DTI) of the brain in pedohebephilic men: Preliminary analyses*. Harvey Stancer Research Day, Toronto, Ontario Canada.
7. Newman, J. E., Stephens, S., Seto, M. C., & Cantor, J. M. (2014, October). *The validity of the Static-99 in sexual offenders with low intellectual abilities*. Poster presentation at the 33rd annual meeting of the Association for the Treatment of Sexual Abusers, San Diego, CA.
8. Lykins, A. D., Walton, M. T., & Cantor, J. M. (2014, June). *An online assessment of personality, psychological, and sexuality trait variables associated with self-reported hypersexual behavior*. Poster presentation at the 30th annual meeting of the International Academy of Sex Research, Dubrovnik, Croatia.
9. Stephens, S., Seto, M. C., Cantor, J. M., Goodwill, A. M., & Kuban, M. (2013, November). *The utility of phallometry in the assessment of hebephilia*. Poster presented at the 32nd annual meeting of the Association for the Treatment of Sexual Abusers, Chicago.
10. Stephens, S., Seto, M. C., Cantor, J. M., Goodwill, A. M., & Kuban, M. (2013, October). *The role of hebephilic sexual interests in sexual victim choice*. Poster presented at the 32nd annual meeting of the Association for the Treatment of Sexual Abusers, Chicago.
11. Fazio, R. L., & Cantor, J. M. (2013, October). *Analysis of the Fazio Laterality Inventory (FLI) in a population with established atypical handedness*. Poster presented at the 33rd annual meeting of the National Academy of Neuropsychology, San Diego.
12. Lafaille, S., Hannah, J., Soh, D., Kucyi, A., Girard, T. A., Mikulis, D. M., & Cantor, J. M. (2013, August). *Investigating resting state networks in pedohebephiles*. Poster presented at the 29th annual meeting of the International Academy of Sex Research, Chicago.

13. McPhail, I. V., Lykins, A. D., Robinson, J. J., LeBlanc, S., & Cantor, J. M. (2013, August). *Effects of prescription medication on volumetric phallometry output*. Poster presented at the 29th annual meeting of the International Academy of Sex Research, Chicago.
14. Murray, M. E., Dyshniku, F., Fazio, R. L., & Cantor, J. M. (2013, August). *Minor physical anomalies as a window into the prenatal origins of pedophilia*. Poster presented at the 29th annual meeting of the International Academy of Sex Research, Chicago.
15. Sutton, K. S., Stephens, S., Dyshniku, F., Tulloch, T., & Cantor, J. M. (2013, August). *Pilot group treatment for "procrasturbation."* Poster presented at 39th annual meeting of the International Academy of Sex Research, Chicago.
16. Sutton, K. S., Pytyck, J., Stratton, N., Sylva, D., Kolla, N., & Cantor, J. M. (2013, August). *Client characteristics by type of hypersexuality referral: A quantitative chart review*. Poster presented at the 39th annual meeting of the International Academy of Sex Research, Chicago.
17. Fazio, R. L., & Cantor, J. M. (2013, June). *A replication and extension of the psychometric properties of the Digit Vigilance Test*. Poster presented at the 11th annual meeting of the American Academy of Clinical Neuropsychology, Chicago.
18. Lafaille, S., Moayed, M., Mikulis, D. M., Girard, T. A., Kuban, M., Blak, T., & Cantor, J. M. (2012, July). *Diffusion Tensor Imaging (DTI) of the brain in pedohebephilic men: Preliminary analyses*. Poster presented at the 38th annual meeting of the International Academy of Sex Research, Lisbon, Portugal.
19. Lykins, A. D., Cantor, J. M., Kuban, M. E., Blak, T., Dickey, R., Klassen, P. E., & Blanchard, R. (2010, July). *Sexual arousal to female children in gynephilic men*. Poster presented at the 38th annual meeting of the International Academy of Sex Research, Prague, Czech Republic.
20. Cantor, J. M., Girard, T. A., Lovett-Barron, M., & Blak, T. (2008, July). *Brain regions responding to visual sexual stimuli: Meta-analysis of PET and fMRI studies*. Abstract and poster presented at the 34th annual meeting of the International Academy of Sex Research, Leuven, Belgium.
21. Lykins, A. D., Blanchard, R., Cantor, J. M., Blak, T., & Kuban, M. E. (2008, July). *Diagnosing sexual attraction to children: Considerations for DSM-V*. Poster presented at the 34th annual meeting of the International Academy of Sex Research, Leuven, Belgium.
22. Cantor, J. M., Blak, T., Kuban, M. E., Klassen, P. E., Dickey, R. and Blanchard, R. (2007, October). *Physical height in pedophilia and hebephilia*. Poster presented at the 26th annual meeting of the Association for the Treatment of Sexual Abusers, San Diego.
23. Cantor, J. M., Blak, T., Kuban, M. E., Klassen, P. E., Dickey, R. and Blanchard, R. (2007, August). *Physical height in pedophilia and hebephilia*. Abstract and poster presented at the 33rd annual meeting of the International Academy of Sex Research, Vancouver, Canada.
24. Puts, D. A., Blanchard, R., Cardenas, R., Cantor, J., Jordan, C. L., & Breedlove, S. M. (2007, August). *Earlier puberty predicts superior performance on male-biased visuospatial tasks in men but not women*. Abstract and poster presented at the 33rd annual meeting of the International Academy of Sex Research, Vancouver, Canada.
25. Seto, M. C., Cantor, J. M., & Blanchard, R. (2005, November). *Possession of child pornography is a diagnostic indicator of pedophilia*. Poster presented at the 24th annual meeting of the Association for the Treatment of Sexual Abusers, New Orleans.

26. Blanchard, R., Cantor, J. M., Bogaert, A. F., Breedlove, S. M., & Ellis, L. (2005, July). *Interaction of fraternal birth order and handedness in the development of male homosexuality*. Abstract and poster presented at the 31st annual meeting of the International Academy of Sex Research, Ottawa, Canada.
27. Cantor, J. M., & Blanchard, R. (2003, July). *The reported VIQ–PIQ differences in male sex offenders are artifactual?* Abstract and poster presented at the 29th annual meeting of the International Academy of Sex Research, Bloomington, Indiana.
28. Christensen, B. K., Cantor, J. M., Millikin, C., & Blanchard, R. (2002, February). *Factor analysis of two brief memory tests: Preliminary evidence for modality-specific measurement*. Poster presented at the 30th annual meeting of the International Neuropsychological Society, Toronto, Ontario, Canada.
29. Cantor, J. M., Blanchard, R., Paterson, A., Bogaert, A. (2000, June). *How many gay men owe their sexual orientation to fraternal birth order?* Abstract and poster presented at the International Behavioral Development Symposium, Minot, North Dakota.
30. Cantor, J. M., Binik, Y., & Pfaus, J. G. (1996, November). *Fluoxetine inhibition of male rat sexual behavior: Reversal by oxytocin*. Poster presented at the 26th annual meeting of the Society for Neurosciences, Washington, DC.
31. Cantor, J. M., Binik, Y., & Pfaus, J. G. (1996, June). *An animal model of fluoxetine-induced sexual dysfunction: Dose dependence and time course*. Poster presented at the 28th annual Conference on Reproductive Behavior, Montréal, Canada.
32. Cantor, J. M., O'Connor, M. G., Kaplan, B., & Cermak, L. S. (1993, June). *Transient events test of retrograde memory: Performance of amnesic and unimpaired populations*. Poster presented at the 2nd annual science symposium of the Massachusetts Neuropsychological Society, Cambridge, MA.

EDITORIAL AND PEER-REVIEWING ACTIVITIES

Editor-in-Chief

Sexual Abuse: A Journal of Research and Treatment Jan., 2010–Dec., 2014

Editorial Board Memberships

Journal of Sexual Aggression Jan., 2010–Dec., 2021
Journal of Sex Research, The Jan., 2008–Aug., 2020
Sexual Abuse: A Journal of Research and Treatment Jan., 2006–Dec., 2019
Archives of Sexual Behavior Jan., 2004–Present
The Clinical Psychologist Jan., 2004–Dec., 2005

Ad hoc Journal Reviewer Activity

American Journal of Psychiatry
Annual Review of Sex Research
Archives of General Psychiatry
Assessment
Biological Psychiatry
BMC Psychiatry
Brain Structure and Function
British Journal of Psychiatry
British Medical Journal
Canadian Journal of Behavioural Science
Canadian Journal of Psychiatry
Cerebral Cortex
Clinical Case Studies
Comprehensive Psychiatry
Developmental Psychology
European Psychologist
Frontiers in Human Neuroscience
Human Brain Mapping
International Journal of Epidemiology
International Journal of Impotence Research
International Journal of Sexual Health
International Journal of Transgenderism
Journal of Abnormal Psychology
Journal of Clinical Psychology
Journal of Consulting and Clinical Psychology
Journal of Forensic Psychology Practice
Journal for the Scientific Study of Religion
Journal of Sexual Aggression
Journal of Sexual Medicine
Journal of Psychiatric Research
Nature Neuroscience
Neurobiology Reviews
Neuroscience & Biobehavioral Reviews
Neuroscience Letters
Proceedings of the Royal Society B
(Biological Sciences)
Psychological Assessment
Psychological Medicine
Psychological Science
Psychology of Men & Masculinity
Sex Roles
Sexual and Marital Therapy
Sexual and Relationship Therapy
Sexuality & Culture
Sexuality Research and Social Policy
The Clinical Psychologist
Traumatology
World Journal of Biological Psychiatry

GRANT REVIEW PANELS

- 2017–2021 Member, College of Reviewers, *Canadian Institutes of Health Research*, Canada.
- 2017 Committee Member, Peer Review Committee—Doctoral Research Awards A. *Canadian Institutes of Health Research*, Canada.
- 2017 Member, International Review Board, Research collaborations on behavioural disorders related to violence, neglect, maltreatment and abuse in childhood and adolescence. *Bundesministerium für Bildung und Forschung [Ministry of Education and Research]*, Germany.
- 2016 Reviewer. National Science Center [*Narodowe Centrum Nauki*], Poland.
- 2016 Committee Member, Peer Review Committee—Doctoral Research Awards A. *Canadian Institutes of Health Research*, Canada.
- 2015 Assessor (Peer Reviewer). Discovery Grants Program. *Australian Research Council*, Australia.
- 2015 Reviewer. *Czech Science Foundation*, Czech Republic.
- 2015 Reviewer, “Off the beaten track” grant scheme. *Volkswagen Foundation*, Germany.
- 2015 External Reviewer, Discovery Grants program—Biological Systems and Functions. *National Sciences and Engineering Research Council of Canada*, Canada
- 2015 Committee Member, Peer Review Committee—Doctoral Research Awards A. *Canadian Institutes of Health Research*, Canada.
- 2014 Assessor (Peer Reviewer). Discovery Grants Program. *Australian Research Council*, Australia.
- 2014 External Reviewer, Discovery Grants program—Biological Systems and Functions. *National Sciences and Engineering Research Council of Canada*, Canada.
- 2014 Panel Member, Dean’s Fund—Clinical Science Panel. *University of Toronto Faculty of Medicine*, Canada.
- 2014 Committee Member, Peer Review Committee—Doctoral Research Awards A. *Canadian Institutes of Health Research*, Canada.
- 2013 Panel Member, Grant Miller Cancer Research Grant Panel. *University of Toronto Faculty of Medicine*, Canada.

- 2013 Panel Member, Dean of Medicine Fund New Faculty Grant Clinical Science Panel. *University of Toronto Faculty of Medicine*, Canada.
- 2012 Board Member, International Review Board, Research collaborations on behavioural disorders related to violence, neglect, maltreatment and abuse in childhood and adolescence (2nd round). *Bundesministerium für Bildung und Forschung [Ministry of Education and Research]*, Germany.
- 2012 External Reviewer, University of Ottawa Medical Research Fund. *University of Ottawa Department of Psychiatry*, Canada.
- 2012 External Reviewer, Behavioural Sciences—B. *Canadian Institutes of Health Research*, Canada.
- 2011 Board Member, International Review Board, Research collaborations on behavioural disorders related to violence, neglect, maltreatment and abuse in childhood and adolescence. *Bundesministerium für Bildung und Forschung [Ministry of Education and Research]*, Germany.

TEACHING AND TRAINING

PostDoctoral Research Supervision

Law & Mental Health Program, Centre for Addiction and Mental Health, Toronto, Canada

Dr. Katherine S. Sutton	Sept., 2012–Dec., 2013
Dr. Rachel Fazio	Sept., 2012–Aug., 2013
Dr. Amy Lykins	Sept., 2008–Nov., 2009

Doctoral Research Supervision

Centre for Addiction and Mental Health, Toronto, Canada

Michael Walton • University of New England, Australia	Sept., 2017–Aug., 2018
Debra Soh • York University	May, 2013–Aug, 2017
Skye Stephens • Ryerson University	April, 2012–June, 2016

Masters Research Supervision

Centre for Addiction and Mental Health, Toronto, Canada

Nicole Cormier • Ryerson University	June, 2012–present
Debra Soh • Ryerson University	May, 2009–April, 2010

Undergraduate Research Supervision

Centre for Addiction and Mental Health, Toronto, Canada

Kylie Reale • Ryerson University	Spring, 2014
Jarrett Hannah • University of Rochester	Summer, 2013
Michael Humeniuk • University of Toronto	Summer, 2012

Clinical Supervision (Doctoral Internship)

Clinical Internship Program, Centre for Addiction and Mental Health, Toronto, Canada

Katherine S. Sutton • Queen's University	2011–2012
David Sylva • Northwestern University	2011–2012
Jordan Rullo • University of Utah	2010–2011
Lea Thaler • University of Nevada, Las Vegas	2010–2011
Carolin Klein • University of British Columbia	2009–2010
Bobby R. Walling • University of Manitoba	2009–2010

TEACHING AND TRAINING

Clinical Supervision (Doctoral- and Masters- level practica) Centre for Addiction and Mental Health, Toronto, Canada

Tyler Tulloch • Ryerson University	2013–2014
Natalie Stratton • Ryerson University	Summer, 2013
Fiona Dyshniku • University of Windsor	Summer, 2013
Mackenzie Becker • McMaster University	Summer, 2013
Skye Stephens • Ryerson University	2012–2013
Vivian Nyantakyi • Capella University	2010–2011
Cailey Hartwick • University of Guelph	Fall, 2010
Tricia Teeft • Humber College	Summer, 2010
Allison Reeves • Ontario Institute for Studies in Education/Univ. of Toronto	2009–2010
Helen Bailey • Ryerson University	Summer, 2009
Edna Aryee • Ontario Institute for Studies in Education/Univ. of Toronto	2008–2009
Iryna Ivanova • Ontario Institute for Studies in Education/Univ. of Toronto	2008–2009
Jennifer Robinson • Ontario Institute for Studies in Education/Univ. of Toronto	2008–2009
Zoë Laksman • Adler School of Professional Psychology	2005–2006
Diana Mandelew • Adler School of Professional Psychology	2005–2006
Susan Wnuk • York University	2004–2005
Hiten Lad • Adler School of Professional Psychology	2004–2005
Natasha Williams • Adler School of Professional Psychology	2003–2004
Lisa Couperthwaite • Ontario Institute for Studies in Education/Univ. of Toronto	2003–2004
Lori Gray, née Robichaud • University of Windsor	Summer, 2003
Sandra Belfry • Ontario Institute for Studies in Education/Univ. of Toronto	2002–2003
Althea Monteiro • York University	Summer, 2002
Samantha Dworsky • York University	2001–2002
Kerry Collins • University of Windsor	Summer, 2001
Jennifer Fogarty • Waterloo University	2000–2001
Emily Cripps • Waterloo University	Summer, 2000
Lee Beckstead • University of Utah	2000

PROFESSIONAL SOCIETY ACTIVITIES

OFFICES HELD

- 2018–2019 Local Host. Society for Sex Therapy and Research.
- 2015 Member, International Scientific Committee, World Association for Sexual Health.
- 2015 Member, Program Planning and Conference Committee, Association for the Treatment of Sexual Abusers
- 2012–2013 Chair, Student Research Awards Committee, Society for Sex Therapy & Research
- 2012–2013 Member, Program Planning and Conference Committee, Association for the Treatment of Sexual Abusers
- 2011–2012 Chair, Student Research Awards Committee, Society for Sex Therapy & Research
- 2010–2011 Scientific Program Committee, International Academy of Sex Research
- 2002–2004 Membership Committee • APA Division 12 (Clinical Psychology)
- 2002–2003 Chair, Committee on Science Issues, APA Division 44
- 2002 Observer, Grant Review Committee • Canadian Institutes of Health Research Behavioural Sciences (B)
- 2001–2009 Reviewer • APA Division 44 Convention Program Committee
- 2001, 2002 Reviewer • APA Malyon-Smith Scholarship Committee
- 2000–2005 Task Force on Transgender Issues, APA Division 44
- 1998–1999 Consultant, APA Board of Directors Working Group on Psychology Marketplace
- 1997 Student Representative • APA Board of Professional Affairs' Institute on TeleHealth
- 1997–1998 Founder and Chair • APA/APAGS Task Force on New Psychologists' Concerns
- 1997–1999 Student Representative • APA/CAPP Sub-Committee for a National Strategy for Prescription Privileges
- 1997–1999 Liaison • APA Committee for the Advancement of Professional Practice
- 1997–1998 Liaison • APA Board of Professional Affairs
- 1993–1997 Founder and Chair • APA/APAGS Committee on LGB Concerns

PROFESSIONAL SOCIETY ACTIVITIES

MEMBERSHIPS

- 2017–2021 Member • *Canadian Sex Research Forum*
- 2009–Present Member • *Society for Sex Therapy and Research*
- 2007–Present Fellow • *Association for the Treatment and Prevention of Sexual Abuse*
- 2006–Present Full Member (elected) • *International Academy of Sex Research*
- 2006–Present Research and Clinical Member • *Association for the Treatment and Prevention of Sexual Abuse*
- 2003–2006 Associate Member (elected) • *International Academy of Sex Research*
- 2002 Founding Member • CPA Section on Sexual Orientation and Gender Identity
- 2001–2013 Member • *Canadian Psychological Association (CPA)*
- 2000–2015 Member • *American Association for the Advancement of Science*
- 2000–2015 Member • *American Psychological Association (APA)*
- APA Division 12 (Clinical Psychology)
- APA Division 44 (Society for the Psychological Study of LGB Issues)
- 2000–2020 Member • *Society for the Scientific Study of Sexuality*
- 1995–2000 Student Member • *Society for the Scientific Study of Sexuality*
- 1993–2000 Student Affiliate • *American Psychological Association*
- 1990–1999 Member, American Psychological Association of Graduate Students (APAGS)

CLINICAL LICENSURE/REGISTRATION

Certificate of Registration, Number 3793
College of Psychologists of Ontario, Ontario, Canada

AWARDS AND HONORS

2022 Distinguished Contribution Award

Association for the Treatment and Prevention of Sexual Abuse (ATSA)

2011 Howard E. Barbaree Award for Excellence in Research

Centre for Addiction and Mental Health, Law and Mental Health Program

2004 fMRI Visiting Fellowship Program at Massachusetts General Hospital

American Psychological Association Advanced Training Institute and NIH

1999–2001 CAMH Post-Doctoral Research Fellowship

Centre for Addiction and Mental Health Foundation and Ontario Ministry of Health

1998 Award for Distinguished Contribution by a Student

American Psychological Association, Division 44

1995 Dissertation Research Grant

Society for the Scientific Study of Sexuality

1994–1996 McGill University Doctoral Scholarship

1994 Award for Outstanding Contribution to Undergraduate Teaching

“TA of the Year Award,” from the McGill Psychology Undergraduate Student Association

MAJOR MEDIA

(Complete list available upon request.)

Feature-length Documentaries

Vice Canada Reports. [Age of Consent](#). 14 Jan 2017.

Canadian Broadcasting Company. [I, Pedophile](#). Firsthand documentaries. 10 Mar 2016.

Appearances and Interviews

11 Mar 2020. Ibbitson, John. [It is crucial that Parliament gets the conversion-therapy ban right](#). *The Globe & Mail*.

25 Jan 2020. [Ook de hulpvaardige buurman kan verzamelaar van kinderporno zin](#). *De Morgen*.

3 Nov 2019. [Village of the damned](#). *60 Minutes Australia*.

1 Nov 2019. HÅKON F. HØYDAL. [Norsk nettovergriper: – Jeg hater meg selv: Nordmannen laster ned overgrepsmateriale fra nettet – og oppfordrer politiet til å gi amnesti for slike som ham](#).

10 Oct 2019. Smith, T. [Growing efforts are looking at how—or if—#MeToo offenders can be reformed](#). *National Public Radio*.

29 Sep 2019. Carey, B. [Preying on Children: The Emerging Psychology of Pedophiles](#). *New York Times*.

29 Apr 2019. Mathieu, Isabelle. [La poupée qui a troublé les Terre-Neuviens](#). *La Tribune*.

21 Mar 2019. [Pope Francis wants psychological testing to prevent problem priests. But can it really do that?](#) *The Washington Post*.

12 Dec 2018. [Child sex dolls: Illegal in Canada, and dozens seized at the border](#). Ontario Today with Rita Celli. *CBC*.

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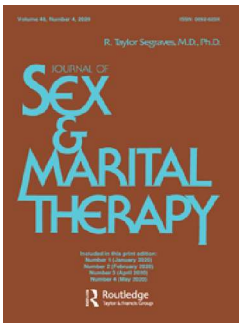
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EXPERT WITNESS TESTIMONY

- | | |
|---|-------------------------|
| 1. 2023 Poe v Drummond | Northern District, OK |
| 2. 2023 L.W. v Skrmetti | Middle District, TN |
| 3. 2023 K.C. v Medical Lic Board of Indiana | Southern District, IN |
| 4. 2023 Doe v Superintendent of Public Instruction | District of Arizona, AZ |
| 5. 2022 Baunee v Dept of Corrections | Onondaga County, NY |
| 6. 2022 Bridge v Oklahoma State Dept of Education | Western District, OK |
| 7. 2022 Dekker, et al. v Florida Agency for Health Care Admin | Tallahassee, FL |
| 8. 2022 Roe v Utah High School Activities Assn. | Salt Lake County, UT |
| 9. 2022 A.M. v Indiana Public Schools | Southern District, IN |
| 10. 2022 Ricard v Kansas | Geery County, KS |
| 11. 2022 Re Commitment of Baunee | Syracuse, NY |
| 12. 2022 Hersom & Doe v WVa Health & Human Services | Southern District, WV |
| 13. 2022 Eknes-Tucker v Alabama | Montgomery Cnty, AL |
| 14. 2022 PFLAG, et al. v Texas | Travis County, TX |
| 15. 2022 Doe v Texas | Travis County, TX |
| 16. 2022 BPJ v West Virginia Board of Education | Southern District, WV |
| 17. 2021 Cross et al. v Loudoun School Board | Loudoun, VA |
| 18. 2021 Cox v Indiana Child Services | Child Services, IN |
| 19. 2021 Josephson v University of Kentucky | Western District, KY |
| 20. 2021 Re Commitment of Michael Hughes (Frye Hearing) | Cook County, IL |
| 21. 2021 Arizona v Arnett Clifton | Maricopa County, AZ |
| 22. 2019 US v Peter Bright | Southern District, NY |
| 23. 2019 Spiegel-Savoie v Savoie-Sexten (Custody Hearing) | Boston, MA |
| 24. 2019 Re Commitment of Steven Casper (Frye Hearing) | Kendall County, IL |
| 25. 2019 Re Commitment of Inger (Frye Hearing) | Poughkeepsie, NY |
| 26. 2019 Canada vs John Fitzpatrick (Sentencing Hearing) | Toronto, ON, Canada |
| 27. 2018 Re Commitment of Little (Frye Hearing) | Utica, NY |
| 28. 2017 Re Commitment of Nicholas Bauer (Frye Hearing) | Lee County, IL |
| 29. 2017 US vs William Leford (Presentencing Hearing) | Warnock, GA |
| 30. 2015 Florida v Jon Herb | Naples, FL |
| 31. 2010 Re Detention of William Dutcher | Seattle, WA |



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Transgender and Gender Diverse Children and Adolescents: Fact-Checking of AAP Policy

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ABSTRACT

The American Academy of Pediatrics (AAP) recently published a policy statement: *Ensuring comprehensive care and support for transgender and gender-diverse children and adolescents*. Although almost all clinics and professional associations in the world use what's called the *watchful waiting* approach to helping gender diverse (GD) children, the AAP statement instead rejected that consensus, endorsing *gender affirmation* as the only acceptable approach. Remarkably, not only did the AAP statement fail to include any of the actual outcomes literature on such cases, but it also misrepresented the contents of its citations, which repeatedly said the very opposite of what AAP attributed to them.

The American Academy of Pediatrics (AAP) recently published a policy statement entitled, *Ensuring comprehensive care and support for transgender and gender-diverse children and adolescents* (Rafferty, AAP Committee on Psychosocial Aspects of Child and Family Health, AAP Committee on Adolescence, AAP Section on Lesbian, Gay, Bisexual, and Transgender Health and Wellness, 2018). These are children who manifest discontent with the sex they were born as and desire to live as the other sex (or as some alternative gender role). The policy was quite a remarkable document: Although almost all clinics and professional associations in the world use what's called the *watchful waiting* approach to helping transgender and gender diverse (GD) children, the AAP statement rejected that consensus, endorsing only *gender affirmation*. That is, where the consensus is to delay any transitions after the onset of puberty, AAP instead rejected waiting before transition. With AAP taking such a dramatic departure from other professional associations, I was immediately curious about what evidence led them to that conclusion. As I read the works on which they based their policy, however, I was pretty surprised—rather alarmed, actually: These documents simply did not say what AAP claimed they did. In fact, the references that AAP cited as the basis of their policy instead outright contradicted that policy, repeatedly endorsing *watchful waiting*.

The AAP statement was also remarkable in what it left out—namely, the actual outcomes research on GD children. In total, there have been 11 follow-up studies of GD children, of which AAP cited one (Wallien & Cohen-Kettenis, 2008), doing so without actually mentioning the outcome data it contained. The literature on outcomes was neither reviewed, summarized, nor subjected to meta-analysis to be considered in the aggregate—It was merely disappeared. (The list of all existing studies appears in the appendix.) As they make clear, *every* follow-up study of GD children, without exception, found the same thing: Over puberty, the majority of GD children cease to want to transition. AAP is, of course, free to establish whatever policy it likes on

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whatever basis it likes. But any assertion that their policy is based on evidence is demonstrably false, as detailed below.

AAP divided clinical approaches into three types—conversion therapy, watchful waiting, and gender affirmation. It rejected the first two and endorsed *gender affirmation* as the only acceptable alternative. Most readers will likely be familiar already with attempts to use conversion therapy to change sexual orientation. With regard to gender identity, AAP wrote:

“[C]onversion” or “reparative” treatment models are used to prevent children and adolescents from identifying as transgender or to dissuade them from exhibiting gender-diverse expressions. . . . Reparative approaches have been proven to be not only unsuccessful³⁸ but also deleterious and are considered outside the mainstream of traditional medical practice.^{29,39–42}

The citations were:

38. Haldeman DC. The practice and ethics of sexual orientation conversion therapy. *J Consult Clin Psychol*. 1994;62(2):221–227.
29. Adelson SL; American Academy of Child and Adolescent Psychiatry (AACAP) Committee on Quality Issues (CQI). Practice parameter on gay, lesbian, or bisexual sexual orientation, gender nonconformity, and gender discordance in children and adolescents. *J Am Acad Child Adolesc Psychiatry*. 2012;51(9):957–974.
39. Byne W. Regulations restrict practice of conversion therapy. *LGBT Health*. 2016;3(2):97–99.
40. Cohen-Kettenis PT, Delemarre van de Waal HA, Gooren LJ. The treatment of adolescent transsexuals: changing insights. *J Sex Med*. 2008;5(8):1892–1897.
41. Bryant K. Making gender identity disorder of childhood: historical lessons for contemporary debates. *Sex Res Soc Policy*. 2006;3(3):23–39.
42. World Professional Association for Transgender Health. *WPATH De-Psychopathologisation Statement*. Minneapolis, MN: World Professional Association for Transgender Health; 2010.

AAP’s claims struck me as odd because *there are no studies of conversion therapy for gender identity*. Studies of conversion therapy have been limited to *sexual orientation*, and, moreover, to the sexual orientation of *adults*, not to gender identity and not of children in any case. The article AAP cited to support their claim (reference number 38) is indeed a classic and well-known review, but it is a review of sexual orientation research *only*. Neither gender identity, nor even children, received a single mention in it. Indeed, the narrower scope of that article should be clear to anyone reading even just its title: “The practice and ethics of *sexual orientation* conversion therapy” [italics added].

AAP continued, saying that conversion approaches for GD children have already been rejected by medical consensus, citing five sources. This claim struck me as just as odd, however—I recalled associations banning conversion therapy for sexual orientation, but not for gender identity, exactly because there is no evidence for generalizing from adult sexual orientation to childhood gender identity. So, I started checking AAP’s citations for that, and these sources too pertained only to sexual orientation, not gender identity (specifics below). What AAP’s sources *did* repeatedly emphasize was that:

- A. Sexual orientation of adults is unaffected by conversion therapy and any other [known] intervention;
- B. Gender dysphoria in childhood before puberty desists in the majority of cases, becoming (cis-gendered) homosexuality in adulthood, again regardless of any [known] intervention; and
- C. Gender dysphoria in childhood persisting after puberty tends to persist entirely.

That is, in the context of GD children, it simply makes no sense to refer to externally induced “conversion”: The majority of children “convert” to cisgender or “desist” from transgender

regardless of any attempt to change them. “Conversion” only makes sense with regard to adult sexual orientation because (unlike childhood gender identity), adult homosexuality never or nearly never spontaneously changes to heterosexuality. Although gender identity and sexual orientation may often be analogous and discussed together with regard to social or political values and to civil rights, they are nonetheless distinct—with distinct origins, needs, and responses to medical and mental health care choices. Although AAP emphasized to the reader that “gender identity is not synonymous with ‘sexual orientation’” (Rafferty et al., 2018, p. 3), they went ahead to treat them as such nonetheless.

To return to checking AAP’s fidelity to its sources: Reference 29 was a practice guideline from the Committee on Quality Issues of the American Academy of Child and Adolescent Psychiatry (AACAP). Despite AAP applying this source to *gender identity*, AACAP was quite unambiguous regarding their intent to speak to sexual orientation and *only* to sexual orientation: “Principle 6. Clinicians should be aware that there is no evidence that *sexual orientation* can be altered through therapy, and that attempts to do so may be harmful. There is no established evidence that change in a predominant, enduring *homosexual* pattern of development is possible. Although sexual fantasies can, to some degree, be suppressed or repressed by those who are ashamed of or in conflict about them, sexual desire is not a choice. However, behavior, social role, and—to a degree—identity and self-acceptance are. Although operant conditioning modifies sexual fetishes, it does not alter *homosexuality*. Psychiatric efforts to alter *sexual orientation* through ‘reparative therapy’ *in adults* have found little or no change in *sexual orientation*, while causing significant risk of harm to self-esteem” (AACAP, 2012, p. 967, italics added).

Whereas AAP cites AACAP to support gender affirmation as the only alternative for treating GD children, AACAP’s actual view was decidedly neutral, noting the lack of evidence: “Given the lack of empirical evidence from randomized, controlled trials of the efficacy of treatment aimed at eliminating gender discordance, the potential risks of treatment, and longitudinal evidence that gender discordance persists in only a small minority of untreated cases arising in childhood, further research is needed on predictors of persistence and desistence of childhood gender discordance as well as the long-term risks and benefits of intervention before any treatment to eliminate gender discordance can be endorsed” (AACAP, 2012, p. 969). Moreover, whereas AAP rejected watchful waiting, what AACAP recommended was: “In general, it is desirable to help adolescents who may be experiencing gender distress and dysphoria to defer sex reassignment until adulthood” (AACAP, 2012, p. 969). So, not only did AAP attribute to AACAP something AACAP never said, but also AAP withheld from readers AACAP’s actual view.

Next, in reference 39, Byne (2016) also addressed only sexual orientation, doing so very clearly: “Reparative therapy is a subset of conversion therapies based on the premise that *same-sex attraction* are reparations for childhood trauma. Thus, practitioners of reparative therapy believe that exploring, isolating, and repairing these childhood emotional wounds will often result in reducing *same-sex attractions*” (Byne, 2016, p. 97). Byne does not say this of gender identity, as the AAP statement misrepresents.

In AAP reference 40, Cohen-Kettenis et al. (2008) did finally pertain to gender identity; however, this article never mentions conversion therapy. (!) Rather, in this study, the authors presented that clinic’s lowering of their minimum age for cross-sex hormone treatment from age 18 to 16, which they did on the basis of a series of studies showing the high rates of success with this age group. Although it did strike me as odd that AAP picked as support against conversion therapy an article that did not mention conversion therapy, I could imagine AAP cited the article as an example of what the “mainstream of traditional medical practice” consists of (the logic being that conversion therapy falls outside what an ‘ideal’ clinic like this one provides). However, what this clinic provides is the very *watchful waiting* approach that AAP rejected. The approach

espoused by Cohen-Kettenis (and the other clinics mentioned in the source—Gent, Boston, Oslo, and now formerly, Toronto) is to make puberty-halting interventions available at age 12 because: “[P]ubertal suppression may give adolescents, together with the attending health professional, more time to explore their gender identity, without the distress of the developing secondary sex characteristics. The precision of the diagnosis may thus be improved” (Cohen-Kettenis et al., 2008, p. 1894).

Reference 41 presented a very interesting history spanning the 1960s–1990s about how feminine boys and tomboyish girls came to be recognized as mostly pre-homosexual, and how that status came to be entered into the DSM at the same time as homosexuality was being *removed* from the DSM. Conversion therapy is never mentioned. Indeed, to the extent that Bryant mentions treatment at all, it is to say that treatment is entirely irrelevant to his analysis: “An important omission from the *DSM* is a discussion of the kinds of treatment that GIDC children should receive. (This omission is a general orientation of the *DSM* and not unique to GIDC)” (Bryant, 2006, p. 35). How this article supports AAP’s claim is a mystery. Moreover, how AAP could cite a 2006 history discussing events of the 1990s and earlier to support a claim about the *current* consensus in this quickly evolving discussion remains all the more unfathomable.

Cited last in this section was a one-paragraph press release from the World Professional Association for Transgender Health. Written during the early stages of the American Psychiatric Association’s (APA’s) update of the *DSM*, the statement asserted simply that “The WPATH Board of Directors strongly urges the de-psychopathologisation of gender variance worldwide.” Very reasonable debate can (and should) be had regarding whether gender dysphoria should be removed from the *DSM* as homosexuality was, and WPATH was well within its purview to assert that it should. Now that the *DSM* revision process is years completed however, history has seen that APA ultimately retained the diagnostic categories, rejecting WPATH’s urging. This makes AAP’s logic entirely backwards: That WPATH’s request to depathologize gender dysphoria was *rejected* suggests that it is WPATH’s view—and therefore the AAP policy—which fall “outside the mainstream of traditional medical practice.” (!)

AAP based this entire line of reasoning on their belief that conversion therapy is being used “to prevent children and adolescents from identifying as transgender” (Rafferty et al., 2018, p. 4). That claim is left without citation or support. In contrast, what is said by AAP’s sources is “delaying affirmation should *not* be construed as conversion therapy or an attempt to change gender identity” in the first place (Byne, 2016, p. 2). Nonetheless, AAP seems to be doing exactly that: simply relabeling any alternative approach as equivalent to conversion therapy.

Although AAP (and anyone else) may reject (what they label to be) conversion therapy purely on the basis of political or personal values, there is no evidence to back the AAP’s stated claim about the existing science on gender identity at all, never mind gender identity of children.

AAP also dismissed the watchful waiting approach out of hand, not citing any evidence, but repeatedly calling it “outdated.” The criticisms AAP provided, however, again defied the existing evidence, with even its own sources repeatedly calling watchful waiting the current standard. According to AAP:

[G]ender affirmation is in contrast to the outdated approach in which a child’s gender-diverse assertions are held as “possibly true” until an arbitrary age (often after pubertal onset) when they can be considered valid, an approach that authors of the literature have termed “watchful waiting.” This outdated approach does not serve the child because critical support is withheld. Watchful waiting is based on binary notions of gender in which gender diversity and fluidity is pathologized; in watchful waiting, it is also assumed that notions of gender identity become fixed at a certain age. The approach is also influenced by a group of early studies with validity concerns, methodologic flaws, and limited follow-up on children who identified as TGD and, by adolescence, did not seek further treatment (“desisters”).^{45,47}

The citations from AAP’s reference list are:

45. Ehrensaft D, Giammattei SV, Storck K, Tishelman AC, Keo-Meier C. Prepubertal social gender transitions: what we know; what we can learn—a view from a gender affirmative lens. *Int J Transgend.* 2018;19(2):251–268
47. Olson KR. Prepubescent transgender children: what we do and do not know. *J Am Acad Child Adolesc Psychiatry.* 2016;55(3):155–156.e3


I was surprised first by the AAP's claim that watchful waiting's delay to puberty was somehow "arbitrary." The literature, including AAP's sources, repeatedly indicated the pivotal importance of puberty, noting that outcomes strongly diverge at that point. According to AAP reference 29, in "*prepubertal* boys with gender discordance—including many without any mental health treatment—the cross gender wishes usually fade over time and do not persist into adulthood, with only 2.2% to 11.9% continuing to experience gender discordance" (Adelson & AACAP, 2012, p. 963, italics added), whereas "when gender variance with the desire to be the other sex is present *in adolescence*, this desire usually does persist through adulthood" (Adelson & AACAP, 2012, p. 964, italics added). Similarly, according to AAP reference 40, "Symptoms of GID *at prepubertal ages* decrease or even disappear in a considerable percentage of children (estimates range from 80–95%). Therefore, any intervention in childhood would seem premature and inappropriate. However, GID persisting *into early puberty* appears to be highly persistent" (Cohen-Kettenis et al., 2008, p. 1895, italics added). That follow-up studies of prepubertal transition differ from postpubertal transition is the very meaning of non-arbitrary. AAP gave readers exactly the reverse of what was contained in its own sources. If AAP were correct in saying that puberty is an arbitrarily selected age, then AAP will be able to offer another point to wait for with as much empirical backing as puberty has.

Next, it was not clear on what basis AAP could say that watchful waiting withholds support—AAP cited no support for its claim. The people in such programs often receive substantial support during this period. Also unclear is on what basis AAP could already know exactly which treatments are "critical" and which are not—Answering that question is the very purpose of this entire endeavor. Indeed, the logic of AAP's claim appears entirely circular: It is only if one were already pre-convinced that gender affirmation is the only acceptable alternative that would make watchful waiting seem to withhold critical support—What it delays is gender affirmation, the method one has already decided to be critical.

Although AAP's next claim did not have a citation appearing at the end of its sentence, binary notions of gender were mentioned both in references 45 and 47. Specifically, both pointed out that existing outcome studies have been about people transitioning from one sex to the other, rather than from one sex to an in-between status or a combination of masculine/feminine features. Neither reference presented this as a reason to reject the results from the existing studies of complete transition however (which is how AAP cast it). Although it is indeed true that the outcome data have been about complete transition, some future study showing that partial transition shows a different outcome would not invalidate what is known about complete transition. Indeed, data showing that partial transition gives better outcomes than complete transition would, once again, support the watchful waiting approach which AAP rejected.

Next was a vague reference alleging concerns and criticisms about early studies. Had AAP indicated what those alleged concerns and flaws were (or which studies they were), then it would be possible to evaluate or address them. Nonetheless, the argument is a red herring: Because all of the later studies showed the same result as did the early studies, any such allegation is necessarily moot.

Reference 47 was a one-and-a-half page commentary in which the author off-handedly mentions criticisms previously made of three of the eleven outcome studies of GD children, but does not provide any analysis or discussion. The only specific claim was that studies (whether early or late) had limited follow-up periods—the logic being that had outcome researchers lengthened the follow-up period, then people who seemed to have desisted might have returned to the clinic as

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cases of “persistence-after-interruption.” Although one could debate the merits of that prediction, AAP instead simply withheld from the reader the result from the original researchers having tested that very prediction directly: Steensma and Cohen-Kettenis (2015) conducted another analysis of their cohort, by then ages 19–28 (mean age 25.9 years), and found that 3.3% (5 people of the sample of 150) later returned. That is, in long-term follow-up, the childhood sample showed 66.7% desistance instead of 70.0% desistance.

Reference 45 did not support the claim that watchful-waiting is “outdated” either. Indeed, that source said the very opposite, explicitly referring to watchful waiting as the *current* approach: “Put another way, if clinicians are straying from SOC 7 guidelines for social transitions, not abiding by the watchful waiting model *favored by the standards*, we will have adolescents who have been consistently living in their affirmed gender since age 3, 4, or 5” (Ehrensaft et al., 2018, p. 255). Moreover, Ehrensaft et al. said there are cases in which they too would still use watchful waiting: “When a child’s gender identity is unclear, the watchful waiting approach can give the child and their family time to develop a clearer understanding and is not necessarily in contrast to the needs of the child” (p. 259). Ehrensaft et al. are indeed critical of the watchful waiting model (which they feel is applied too conservatively), but they do not come close to the position the AAP policy espouses. Where Ehrensaft summarizes the potential benefits and potential risks both to transitioning and not transitioning, the AAP presents an ironically binary narrative.

In its policy statement, AAP told neither the truth nor the whole truth, committing sins both of commission and of omission, asserting claims easily falsified by anyone caring to do any fact-checking at all. AAP claimed, “This policy statement is focused specifically on children and youth that identify as TGD rather than the larger LGBTQ population”; however, much of that evidence was about sexual orientation, not gender identity. AAP claimed, “Current available research and expert opinion from clinical and research leaders ... will serve as the basis for recommendations” (pp. 1–2); however, they provided recommendations entirely unsupported and even in direct opposition to that research and opinion.

AAP is advocating for something far in excess of mainstream practice and medical consensus. In the presence of compelling evidence, that is just what is called for. The problems with Rafferty, however, do not constitute merely a misquote, a misinterpretation of an ambiguous statement, or a missing reference or two. Rather, AAP’s statement is a systematic exclusion and misrepresentation of entire literatures. Not only did AAP fail to provide compelling evidence, it failed to provide the evidence at all. Indeed, AAP’s recommendations are *despite* the existing evidence.

Disclosure statement

No potential conflict of interest was reported by the author.

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Appendix

Count	Group	Study
2/16	gay*	Lebovitz, P. S. (1972). Feminine behavior in boys: Aspects of its outcome. <i>American Journal of Psychiatry</i> , 128, 1283–1289.
4/16	trans-/crossdress	
10/16	straight*/uncertain	
2/16	trans-	Zuger, B. (1978). Effeminate behavior present in boys from childhood: Ten additional years of follow-up. <i>Comprehensive Psychiatry</i> , 19, 363–369.
2/16	uncertain	
12/16	gay	
0/9	trans-	Money, J., & Russo, A. J. (1979). Homosexual outcome of discordant gender identity/role: Longitudinal follow-up. <i>Journal of Pediatric Psychology</i> , 4, 29–41.
9/9	gay	
2/45	trans-/crossdress	Zuger, B. (1984). Early effeminate behavior in boys: Outcome and significance for homosexuality. <i>Journal of Nervous and Mental Disease</i> , 172, 90–97.
10/45	uncertain	
33/45	gay	
1/10	trans-	Davenport, C. W. (1986). A follow-up study of 10 feminine boys. <i>Archives of Sexual Behavior</i> , 15, 511–517.
2/10	gay	
3/10	uncertain	
4/10	straight	
1/44	trans-	Green, R. (1987). <i>The "sissy boy syndrome" and the development of homosexuality</i> . New Haven, CT: Yale University Press.
43/44	cis-	
0/8	trans-	Kosky, R. J. (1987). Gender-disordered children: Does inpatient treatment help? <i>Medical Journal of Australia</i> , 146, 565–569.
8/8	cis-	
21/54	trans-	Wallien, M. S. C., & Cohen-Kettenis, P. T. (2008). Psychosexual outcome of gender-dysphoric children. <i>Journal of the American Academy of Child and Adolescent Psychiatry</i> , 47, 1413–1423.
33/54	cis-	
3/25	trans-	Drummond, K. D., Bradley, S. J., Badali-Peterson, M., & Zucker, K. J. (2008). A follow-up study of girls with gender identity disorder. <i>Developmental Psychology</i> , 44, 34–45.
6/25	lesbian/bi-	
16/25	straight	
17/139	trans-	Singh, D. (2012). <i>A follow-up study of boys with gender identity disorder</i> . Unpublished doctoral dissertation, University of Toronto.
122/139	cis-	
47/127	trans-	Steensma, T. D., McGuire, J. K., Kreukels, B. P. C., Beekman, A. J., & Cohen-Kettenis, P. T. (2013). Factors associated with desistence and persistence of childhood gender dysphoria: A quantitative follow-up study. <i>Journal of the American Academy of Child and Adolescent Psychiatry</i> , 52, 582–590.
80/127	cis-	

*For brevity, the list uses "gay" for "gay and cis-", "straight" for "straight and cis-", etc.