

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

JANE DOE et al.,

Plaintiffs,

v.

JOSEPH A. LADAPO et al.,

Defendants.

Civil No. 4:23-cv-00114-RH-MAF

NOTICE OF FILING PLAINTIFFS' CLOSING DEMONSTRATIVE

Consistent with this Court's instructions, Tr. 625:16-25, Plaintiffs file their closing demonstrative.

Respectfully submitted this 28th day of December, 2023.

/s/ Simone Chriss

Simone Chriss
Counsel for Plaintiffs

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* Admitted by *pro hac vice*

Counsel for Plaintiffs

LOCAL RULES CERTIFICATION

I certify that this Notice complies with this Court's word count, spacing, and formatting requirements.

/s/ Simone Chriss
Simone Chriss

CERTIFICATE OF SERVICE

I hereby certify that, on December 28, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

/s/ Simone Chriss
Simone Chriss
Counsel for Plaintiffs

SB 254

- (1) **bans sex-reassignment prescriptions and procedures for transgender minors** and provides that violation is grounds for disciplinary action and a felony of the third degree;
- (2) **limited continued use exception** for transgender minors already receiving care at the time the law takes effect subject to “standards of practice” adopted by the Boards;
- (3) **requires transgender adults to sign consent forms created by Boards in the physical presence of the physician** who is to prescribe or administer the sex-reassignment prescription or procedure, including for both existing and new prescriptions;
- (4) imposes **physician-only requirement** for prescription or administration of sex-reassignment prescriptions or procedures;
- (5) creates **criminal penalties** for violations.

Restrictions For Transgender Adult Care:

- **Must sign consent forms created by Boards in the physical presence of a physician** who is to prescribe or administer the pharmaceutical product or perform the procedure.
- **Must receive sex-reassignment prescriptions or procedures only from licensed physicians**, thus barring the receipt of care from autonomous-certified APRNs
- **Requires transgender adults to undergo therapy** with a licensed mental health professional during treatment as a condition of receiving hormone therapy

JANE DOE

“I think her life will be completely devastated, turned upside down in every sense of the word. Everything that she knows will be different. She will be forced to turn into someone and something that she’s not. Our entire family will suffer. I’ll suffer as her mother.” (Tr. Day 1, 39:4-8)

“Being a military family, it’s not that easy. I think about, Will our family get torn apart? Will we have to go live somewhere else away from my husband? Will he have to stay here? What will happen to my other children’s lives? What will happen to Susan’s life? How will we do it financially? Just all of it being just completely taken away, everything she’s known, making her experience things that she’s never known, an instability that she’s never known, and that’s protecting my daughter?” (Tr. Day 1, 41:3-10)

GLORIA GOE

“His body will develop. He’ll go through puberty. He’ll no longer be able to safely identify as male.” (Tr. Day 1, 62:1-2)

“My son would not go to school if he did not have access to care. I could not get him to go to school.” (Tr. Day 1, 62:12-13)

“[T]he morning of [our appointment at the gender clinic at Johns Hopkins All Children’s Hospital] I called to make sure that everything was okay and that we still had our appointment, and I had trouble even connecting to the clinic. . . . I was transferred around a few times and eventually was told that some type of law had passed, and that was it.” (Tr. Day 1, 60:16-23)

LUCIEN HAMEL

“This is my home. I’ve lived here my entire life. This is my son’s home, and for various reasons, I can’t just up and uproot my family and move across the country.” (Tr. Day 1, 85:17-19)

“[T]hey’re not scheduling until the middle of 2024, or, . . . [one clinic] doesn’t take any form of insurance [requiring] a long drive . . . , and then [a] \$385 fee . . . on top of lab orders It was incredibly cost inefficient. So between distance and, you know, financial limitations, I wasn’t able to establish care within Florida. I also tried to reach out to providers outside of Florida.” (Tr. Day 1, 87:10-21)

“[T]hrough all of the research that I did, and all of the barriers that I faced, I was not able to establish care anywhere else before my testosterone ran out.” (Tr. Day 1, 87:9-11)

Presumption of Good Faith

While courts must presume that legislation is enacted in good faith, evidence of invidious discrimination overcomes that presumption. (*League of Women Voters of Fla., Inc.*, 32 F.4th 1363, 1373-74 (11th Cir. 2022))

Here the evidence overwhelmingly shows that “the decisionmaker . . . selected or reaffirmed a particular course of action at least in part ‘because of,’ and not merely ‘in spite of,’ its adverse effects upon an identifiable group.” (*Personnel Adm'r of Mass. v. Feeney*, 442 U.S. 256, 279 (1979))

State's Justifications Are Pretext For Invidious Discrimination

- As the Court of Appeals reaffirmed, **limiting care for transgender people will “trigger heightened scrutiny” if the limitation “is a pretext for invidious discrimination against such individuals.”**

Eknes-Tucker v. Governor of Ala., 80 F.4th 1205, 1230 (11th Cir. 2023)

- “In support of their position, the defendants have proffered a laundry list of purported justifications,” which “are largely pretextual” *Dekker v. Weida*, Slip Op. at 38, *Doe v. Ladapo*, Slip Op. at 27



“Low quality” evidence



Bias in medical organizations



Malpractice



Risks attendant to treatment



International Views



Continuation of treatment



Off-label use of FDA-approved drugs

Factors Demonstrating Invidious Discrimination

League of Women Voters of Fla., 66 F.4th 905 (11th Cir. 2023); *Arlington Heights*, 429 U.S. 252 (1977)

- Impact of the challenged law
- Historical backdrop
- Sequence of events leading to passage
- Departures from practice
- Contemporary statements of key decisionmakers
- Foreseeability of disparate impact
- Knowledge of impact
- Availability of less discriminatory alternatives

ANTI-TRANSGENDER LAWS

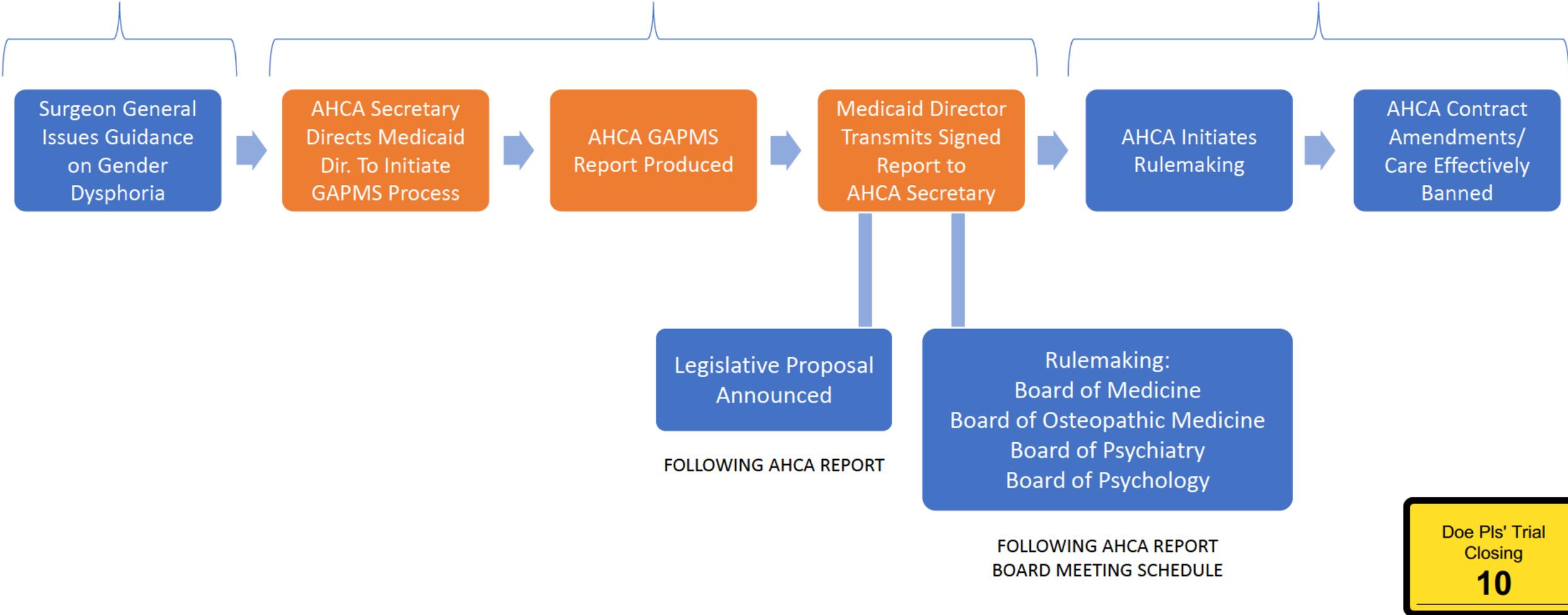
- Sports Ban
 - SB 1028 (2021)
- Classroom Instruction Ban
 - HB 1557 (2022) & Fla. Admin. Code R. 6A-10.081
- Book Ban
- School Pronoun Ban
 - HB 1069 (2023)
- Bathroom Ban
 - HB 1069 (2023), Fla. Admin. Code R. 6A-14.00612; R. 6A-6.0963
- Drag Show Ban
 - HB 1438 (2023)

Gender Dysphoria/Transgender Health Care Policy Pathway

April 2022

APRIL – EARLY JUNE 2022
(SIX WEEKS)

JUNE – SEPTEMBER 2022
(MINIMUM 90-120 DAYS/EXCLUDING RULE CHALLENGES)

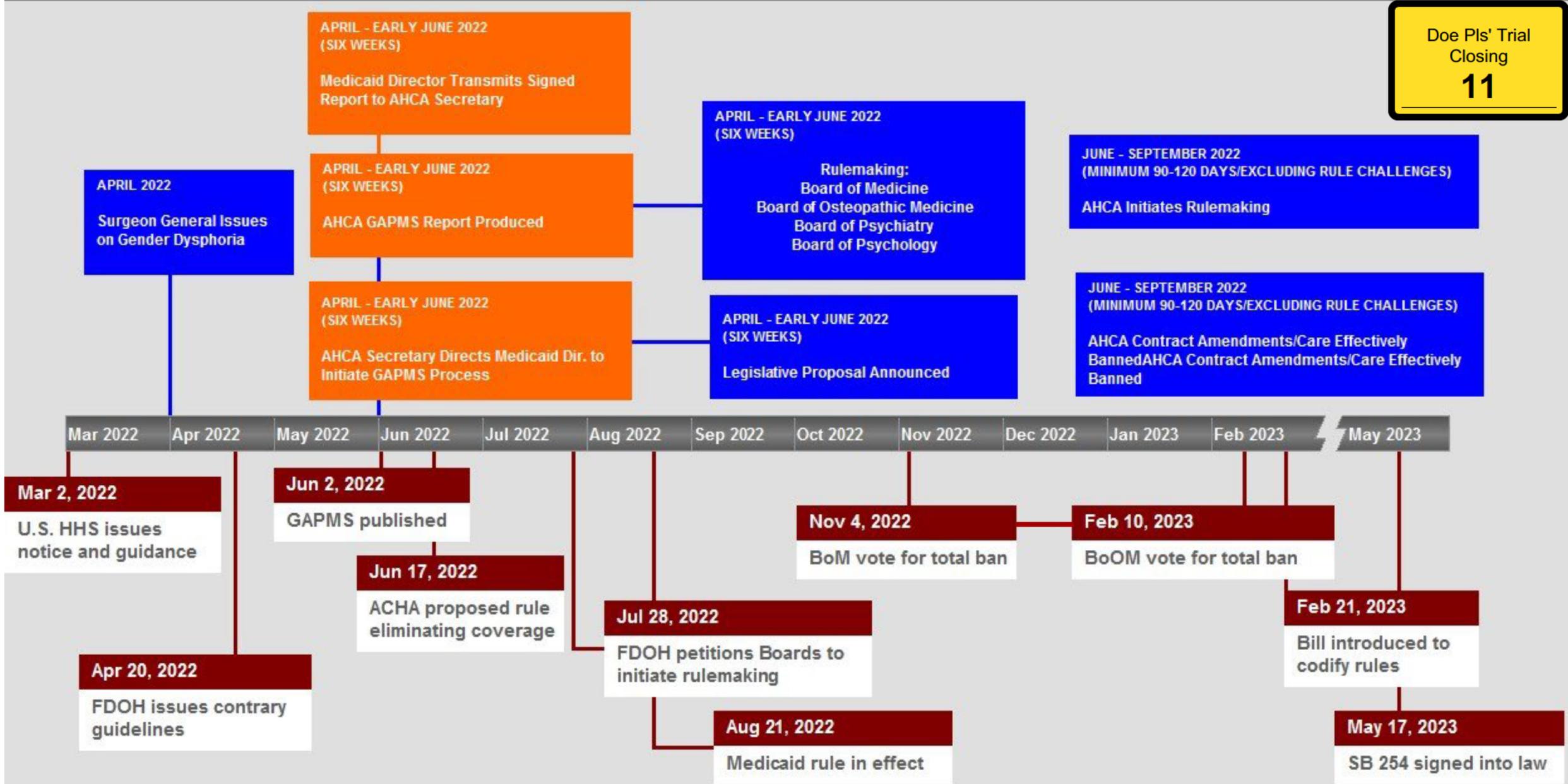


Doe Pls' Trial Closing
10

Pl. Trial Ex. 296

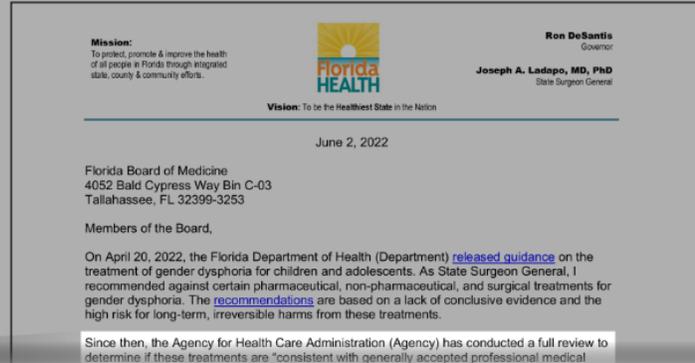
^ GAPMS: Determining Generally Accepted Professional Medical Standards

Doe Pls' Trial Closing
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Timeline for Governor's Plan

GAPMS Was At The Root of the Boards Of Medicine Process and Rules



Since then, the Agency for Health Care Administration (Agency) has conducted a full review to determine if these treatments are "consistent with generally accepted professional medical standards (GAPMS) and not experimental or investigational." The Agency's review included an

political ideology instead of the highest level of generally accepted medical science. Florida must do more to protect children from politics-based medicine. Otherwise, children and adolescents in our state will continue to face a substantial risk of long-term harm.

The Agency ultimately concluded that "Available medical literature provides insufficient evidence that sex reassignment through medical interventions is a safe and effective treatment for gender dysphoria." I encourage the Board to review the Agency's findings and the Department's

dysphoria." I encourage the Board to review the Agency's findings and the Department's guidance to establish a standard of care for these complex and irreversible procedures.

4052 Bald Cypress Way, Bin A-00 • Tallahassee, FL 32399-1701
PHONE: 850/943-4210 • FAX: 850/922-9453

Public Health Accreditation Board

PL000951

Doe Pls' Trial Ex.
15

Surgeon General Ladapo sends a letter to the Boards of Medicine.

Ex. 15 (Doe)

Doe Pls' Trial
Closing
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GAPMS Was At The Root of the Boards Of Medicine Process and Rules

RECEIVED
 DEPARTMENT OF HEALTH
 2022 JUL 28 PM 3:47
 OFFICE OF THE CLERK

STATE OF FLORIDA
 DEPARTMENT OF HEALTH
 BOARD OF MEDICINE

In Re: Petition to Initiate Rulemaking Setting the Standard of Care for Treatment of Gender Dysphoria

FLORIDA DEPARTMENT OF HEALTH'S PETITION TO INITIATE RULEMAKING

Pursuant to Section 120.54(7), Florida Statutes, the Florida Department of Health (Department) hereby files this Petition to Initiate Rulemaking and in support thereof states as follows:

Standing and Authority

1. Pursuant to section 20.43, Florida Statutes, the purpose of the Department is to protect and promote the health of all residents and visitors in the state through organized state and community efforts.
2. Section 20.43(e), Florida Statutes, requires the Department to ensure the provision of quality health care and related services to identified populations in the state.
3. Section 20.43(g), Florida Statutes, requires the Department to regulate health practitioners for the preservation of the health, safety, and welfare of the public.
4. The Department has a substantial interest in the regulation of

1

PL000952

Doe Pls' Trial Ex. 16

Agency Report

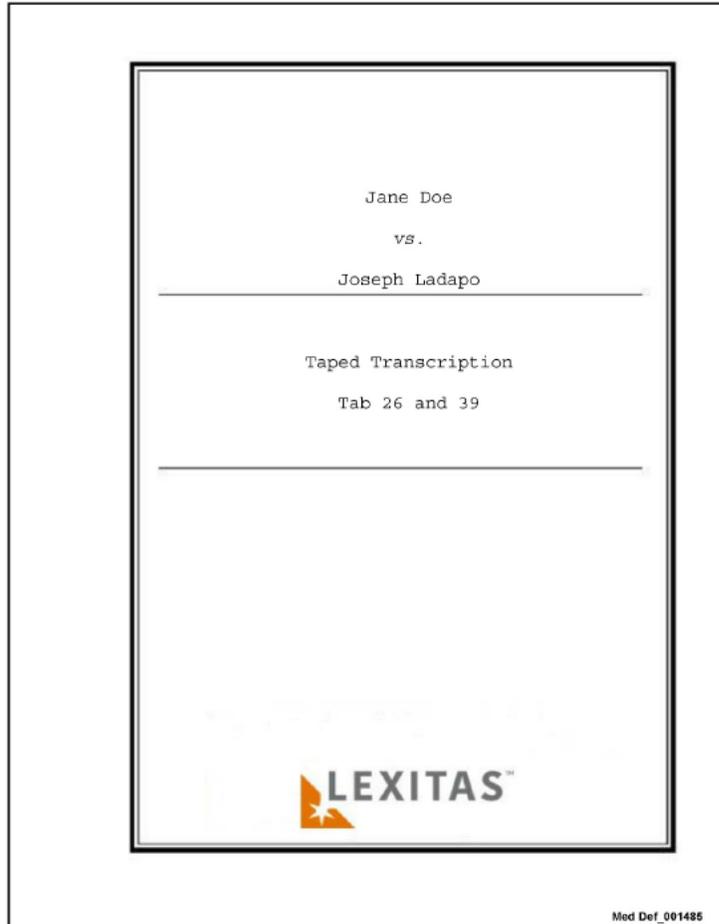
13. Based on the Department's advisory, the Agency for Health Care Administration (Agency) conducted a study to determine whether such procedures are consistent with generally accepted professional medical standards. The Agency published its findings on June 2, 2022, a copy of which is attached as Exhibit B.

Department of Health General Counsel sends a petition to the Boards of Medicine to initiate rulemaking. The petition rests on AHCA recommendations and includes the GAPMS report as an exhibit.

Ex. 16 (Doe)

Doe Pls' Trial Closing
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GAPMS Was At The Root of the Boards Of Medicine Process and Rules



16 AHCA has concluded their report, and they
 17 have determined that these treatments do not conform
 18 with generally accepted medical standards. That
 19 report is attached to the motion and is part of your
 20 materials.

Aug. 5, 2022, Board of Medicine meeting transcript includes statements by FDOH General Counsel John Wilson describing AHCA's recommendations against gender transition medications and references the GAPMS Report.

Ex. 23 (Doe)

Departure from past practice

- Boards’ “usual rulemaking process is responsive . . . to a set of disciplinary cases, an ongoing dialogue with a trade association or professional association, or after the legislature’s mandated you to engage in rulemaking.” (Trial Ex. 23, at 16:12-17:2)
 - **Boards adopted regulatory ban before any legislation was filed**
- Department of Health General Counsel John Wilson – “not willing to wait” for an actual controversy (Trial Ex. 23 at 17:11-15); see also Dr. Mortenson (Dep. Tr. at 149:6-8)(“Q: Are you aware of any complaints filed against providers for providing this care inappropriately? A: Not yet.”)
 - **No specific complaints relating to care filed with or brought to the board**

Standard Board Hearing Practice

Notice of Meeting/Workshop Hearing

DEPARTMENT OF HEALTH
BOARD OF MEDICINE

RULE NO.: 64B8-9.019 RULE TITLE: Practice Standards for the Treatment of Gender Dysphoria

The Florida Boards of Medicine and Osteopathic Medicine Joint Rules/Legislative Committee announce a workshop to which all persons are invited.

DATE AND TIME: Friday, October 28, 2022, 8:00 a.m. EDT and ending no later than 1:00 p.m. EDT

PLACE: Hyatt Regency Orlando International Airport, 9300 Jeff Fuqua Boulevard, Orlando, Florida 32827

GENERAL SUBJECT MATTER TO BE CONSIDERED: The Florida Boards of Medicine and Osteopathic Medicine Joint Rules/Legislative Committee will conduct a rule workshop and meeting to receive and consider presentations from subject matter experts and comments from the public, and to discuss and develop draft rule language related to practice standards for the treatment of gender dysphoria. A copy of the agenda may be obtained by contacting: Board of Medicine by email at BOM.MeetingMaterials@flhealth.gov or by calling the Board of Medicine at (850)245-4131. Written public comments should not be sent to this email address. Information regarding written public comment submissions is provided below.

Public comments presented at the workshop will be limited to no more than two hours in total. Any person who

Public comments presented at the workshop will be limited to no more than two hours in total. Any person who wants to make public comments must notify board staff in writing. **Speaker cards will be available at the workshop for this purpose.** Public comments will be limited to three minutes per person. This time will not include time spent by the public commenter responding to questions imposed by Committee members, staff, or board counsel. **If a group or faction of persons consisting of five or more persons wishes to address the Committee, please identify one individual who will speak on behalf of the group.** Public commenters may use pseudonyms if they do not wish to identify themselves on the record. All public comments received at the workshop will become part of the rulemaking record.

If you are hearing or speech impaired, please contact the Committee using the Florida Relay Service at 1(800)955-8771 (TDD) or (800) 955-8770 (Voice).

If any person decides to appeal any decision made by the Boards with respect to any matter considered at this meeting or hearing, they will need to ensure that a verbatim record of the proceeding is made, including the testimony and evidence from which the appeal is to be issued.

For more information, you may contact: Florida Board of Medicine by email at BOM.MeetingMaterials@flhealth.gov or by calling the Board at (850)245-4131.

Stacking the Deck

From: Strickland, Bettye C <Bettye.Strickland@flhealth.gov>
Sent: Wednesday, October 26, 2022 11:42 AM
To: Terrell, Danielle <Danielle.Terrell@flhealth.gov>; Vazquez, Paul <Paul.Vazquez@flhealth.gov>
Cc: Williams, Cyra <Cyra.Williams@flhealth.gov>; Washington, Shaila <Shaila.Washington@flhealth.gov>

Received. We will pre-fill out speaker cards for the detransitioners and parent on the list and have them waiting.

Subject: FW: List of testifiers

Please see the list of people below that will be the first to make public comment. We need to ensure that cards are filled out for all detransitioners and the parent.

Please see the list of people below that will be the first to make public comment. We need to ensure that cards are filled out for all detransitioners and the parent.

From: [Terrell, Danielle](#)
To: [Vernadette Broyles](#)
Cc: [Noelle Kahajan](#)
Subject: RE: List of testifiers
Date: Wednesday, October 26, 2022 11:38:31 AM
Attachments: [image001.png](#)
[10.28.22 Agenda.pdf](#)

Good morning,

Thank you for taking time to speak with me yesterday. I have received the list below. The Florida Boards of Medicine and Osteopathic Medicine Joint Rules/Legislative Committee workshop will be conducted on October 28, 2022, from 8:00 a.m. EDT to 1:00 p.m. EDT. Within that timeframe, we must ensure that subject matter expert presentations and public comments are received and rule development and discussion is conducted. As discussed, they will be first to speak during the public comments portion of the workshop.

The subject matter experts, including Dr. Laidlaw, will be heard first and given 10 minutes each to present to the Committee. This will be followed by rule discussion and development and then we

Ex. 42 (Doe)

Expert

Dr. Laidlaw

Detransitioner

Zoe Hawes

Rachel Foster

Chloe Cole

Camille Kiefel

ShapeShifter

Billy Burleigh

Cat Cattinson

Helena Kerschner

Ted Halley

Parent

Yaacov Sheinfeld

Out of State Recruited Speakers – none received care in Florida; all four referenced by Defendants have long course of being cultivated to serve as opponents of care by AHCA; Boards of Medicine; and legislature

- **Chloe Cole**

- **Dekker ECF 59**, Ex. 3 (Cole Decl.); **Dekker ECF 183-8**, AHCA Rule Hearing, at 2:1-3:23 (Cole testimony, first speaker called); **Doe Ex. 44** - Chloe Cole – Surgeon General Roundtable (same day as AHCA hearing because Ladapo already planning to propose ban to Boards while still finalizing AHCA rule); **Doe Ex. 42**, list of pre-filled speaker cards emails; **Doe Ex. 24**, Transcript Oct. 28 2022 Workshop, at 132:25-135:12 (Cole Testimony); **Doe Ex. 27**, Tr. of Feb. 21, 2023 Legislative Hearing; **Doe Ex. 32**, Tr. of March 27, 2023, Legislative Hearing.

- **Cat Cattinson**

- **Doe Ex. 56**, Gender Affirming Guidance Event; **Doe Ex. 42**, list of pre-filled speaker cards emails; **Doe Ex. 24**, Transcript Oct. 28 2022 Workshop, at 132:25-135:12

- **Zoe Hawes**

- **Dekker ECF 59**, Ex. 6 (Hawes Decl.); **Dekker, ECF 62**, Tr. of Prel. Inj. Hrg. 10.12.22; **Doe Pls' Ex. 42**, list of pre-filled speaker cards emails; **Doe Pls' Tr. Ex. 24**, Transcript Oct. 28 2022 Workshop, at 143:12- 145:3

- **Rachel Foster**

- **Doe Pls' Ex. 42**, list of pre-filled speaker cards emails; **Doe Pls' Tr. Ex. 24**, Transcript Oct. 28 2022 Workshop, at 130:14-132:24

Change in Composition of the Board of Osteopathic Medicine Results in Ban

1) November 4, 2022 Joint Meeting on Proposed Draft Rule Language (Pl. Tr. Ex. 21) – **BoOM declines to adopt ban:**

<u>Board of Osteopathic Medicine Members Present</u>	<u>Position</u>	<u>Vote</u>
Sandra Schwemmer, D.O.	Chair	Decline to ban
Michelle Mendez, D.O.	Vice Chair	Decline to ban
Tiffany Sizemore Di Pietro, D.O.		Decline to ban
William Kirsh, D.O.		Decline to ban
Jorge Gadea, D.O.		Decline to ban

2) Intervening replacements of: Schwemmer; Mendez; and Gadea

3) February 10, 2023 Joint Meeting – **BoOM adopts full ban:**

<u>Board of Osteopathic Medicine Members Present</u>	<u>Position</u>	<u>Vote</u>	<u>Change from Previous Vote</u>
Tiffany Sizemore Di Pietro, D.O.	Chair	Ban	Promoted
William Kirsh, D.O.	Vice Chair	Ban	Promoted
Chris Creegan, Consumer Member		Ban	New member
Watson Ducatel, D.O.		Ban	New member
Monica Mortensen, D.O.		Ban	New member
Gregory Williams, D.O.		Ban	New member

Change in Composition of the Board of Medicine To Ensure Predetermined Outcome

Dr. Hunter, member of anti-trans group SEGM, helps coordinate testimony for AHCA (June 14, 2022)

From: Andre Van Mol
Sent: Tuesday, June 14, 2022 10:33 AM EDT
To: Jason Weida
Subject: Fwd: Florida item

Hi, Jason.

A friend of mine, a pediatrician in Florida with good knowledge on the subject (see his message below), wishes to testify on behalf of the policy. Do I put him in contact with you, or this Patrick Hunter gentleman who contacted me that he is organizing testimony?

Thanks,
 Andre
 Sent from my iPhone

Ex. 52 (Doe)

Dr. Hunter appointed to the FL Board of Medicine prior to Initiation of Rulemaking process (June 17, 2022)

Governor Ron DeSantis Appoints Four to the Board of Medicine

On June 17, 2022, in [News Releases](#). [Recent Appointments](#). by Staff

TALLAHASSEE, Fla. — Today, Governor Ron DeSantis announced the appointment of Dr. Amy Derick, Dr. Patrick Hunter, and Nicole Justice and the reappointment of Dr. David Diamond to the Board of Medicine.

Doe P s' Tra
C os ng
20

Ex. 91 (Doe)

Change in Composition of the Board of Medicine To Ensure Predetermined Outcome

Drs. Benson & Coffman appointed to Board of Medicine on Dec. 28, 2022 following their public comments in support of ban on transgender minor care

Governor Ron DeSantis Appoints Two to the Board of Medicine

Ex. 103 (Doe)

On December 28, 2022, in News Releases, Recent Appointments, by Staff

TALLAHASSEE, Fla. — Today, Governor Ron DeSantis announced the appointment of **Dr. Gregory Coffman** and **Dr. Matthew Benson** to the Board of Medicine.

An Open Letter to the Florida Board of Medicine

Regarding the Proposed Rules to Limit the Use of Hormonal and Surgical Care for Gender Variant Youth

September 23rd, 2022

Sincerely,
Matthew R. Benson, MD
Jacksonville, FL

Ex. 147 (Doe)

I strongly encourage the Florida Board of Medicine to protect the children of Florida from this misguided, detrimental Affirmative Care model.

Sincerely,

Gregory J. Coffman, M.D
Vice Chair Orlando Health Physician Assoc
Department of Pediatrics

Ex. 22 (Doe)

Doe Pls' Trial Closing

MOST DISCRIMINATORY ALTERNATIVE

- Boards of Medicine

- “I want to be very, very clear that this petition does not include individuals with disorders of sex development Is that correct?” Dr. Diamond
- “That’s correct.” Dr. Van Meter
(Ex. 23 Doe, 35:19-36:4)

- Legislature

- “If a child needs puberty blockers because they’re having an early growth spurt, would they be able to get the puberty blockers and hormone therapies?”
Senator Berman
- “[T]hat is not contemplated to be restricted under our bill, Senator.”
Senator Yarborough
(Ex. 31 Doe, 27:8-28:23)

Informed Consents Further Demonstrate Invidious Discrimination

The informed consents further demonstrate efforts to discourage people from being transgender

- Written by people with no knowledge
- Contain factual inaccuracies and misstatements
- Contains wholly irrelevant information
- Add requirements to care (not consistent with Standards of Care)
- Exceed scope SB254 requirements
- Stand in stark contrast to typical informed consents (list only risks, omit benefits entirely)

Physician Only Restriction

Extraordinary – highly unusual to single out one treatment as exception to autonomous practice. (Tr. Day 2, 326:7-9)

APRNs – may prescribe EXACT SAME medications to non-transgender patients and can still diagnose gender dysphoria. (Tr. Day 2, 333:8-14; 326:4-9)

No Medical Basis – inconsistent with standards of care. (Tr. Day 1, 118:6-8; 12-24; 12:20-25)

Devastating effect on availability of care in Florida for transgender patients. (Tr. Day 1, 87:10-21; Day 2 331:17-25; 332:1-5; Tr. Day 2, 110:8-10)

Invidious Discrimination

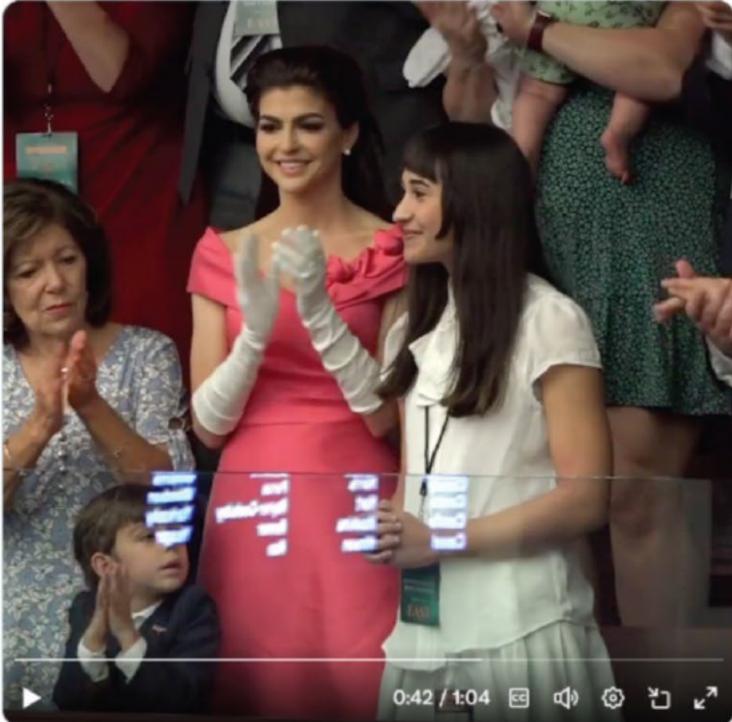
Only explanation is intent to limit access to care.

Contemporary Statements from Key Decisionmakers

Ron DeSantis
@GovRonDeSantis

Children are not guinea pigs for science experiments, and we cannot allow people to make money off mutilating them.

Thank you, **Chloe**, for sharing your story – Florida is listening.



6:00 PM · Mar 14, 2023 · 2.6M Views

Clay Yarborough
@Clay_Yarborough

As a dad, it was an honor to carry bills to protect FL's kids and join @GovRonDeSantis for signing of the bills. Included are protections for minors from: risk-laden sex reassignment surgeries; instruction on inappropriate sexual topics; admission into adult sexual performances.



10:34 AM · May 18, 2023 · 1,371 Views

Doe Pls' Trial Closing
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Ex. 116 (Doe)



Rep. Randy Fine ✓
@VoteRandyFine

I'm being a decent human being, which advocating for five year olds to be lectured about the normality of self-mutilation is not. And for the record, we are outraged — at the groomers who wish to sexualize our children. My Jewish values did instruct me better.



Rep. Randy Fine ✓
@VoteRandyFine

I can say I'm a porcupine, but that doesn't make it so. It is time to dispense with this fantasy making women's sports a joke and our schools into a cesspool. I've taken on Common Core, university corruption, and school board lawbreaking. And won every time. This is next.

11:48 AM · Apr 4, 2022



Rep. Randy Fine ✓
@VoteRandyFine

Yesterday, my colleagues and I proudly took up the mantle to fight for the innocence of children.

There is evil in this world, and we stand up to it today.



Rep. Randy Fine ✓
@VoteRandyFine

If an adult wants to self-mutilate in pursuit of the fiction they can defy G-d and science, more power to them -- as they don't expect me to pay for it. But no child should be put in the position of making life-altering decisions before they are of the age of majority.

11:42 AM · Apr 4, 2022



Rep. Randy Fine ✓
@VoteRandyFine

Just got a media call for comment on people leaving FL because of my bill making child castration illegal. My reply? "Good riddance. Take your evil elsewhere. I hear they love mutilating kids in the woke paradise of CA between homeless camps and "mostly peaceful" protests."

10:48 AM · May 31, 2023 from Indialantic, FL · 2,957 Views



Rep. Randy Fine ✓
@VoteRandyFine

The butchering of children will be illegal in Florida, Florida citizens will not be obligated to pay for the sexual mutilation of adults, and those tricked into this evil will have 30 years to sue those who misled them. That's HB 1421 and I am proud to file it.

10:21 AM · Mar 3, 2023 from Palm Bay, FL · 319.7K Views

Contemporary Statements (Legislative Hearings)

Ex 36, 45:23-46:5

“There is **evil in this world**, and we can fight it here today. . . . We can declare in unambiguous terms that defying the natural process of puberty is not health care; it is an **abomination.**”

Representative Fine

Ex 30 (91:11-19), ECF 178-8 at 91

“There was a woman that her father had three boys and—I’m sorry—three daughters, and she was the fourth daughter. And he changed—started **giving her male hormones when she was 6 months old and changed her into a man.** She did not want that. Now she has hair on her chest, hair on her face. She was changed. And she said that she would like to be a woman again, but her life has been destroyed.” Representative Bell

Ex 36, 21:16-22:6, ECF 179-5

“[W]hat we’re discussing here at this moment, Members, this is the stuff real nightmares are made of. Let’s be perfectly clear, we’re talking about taking little children and they put them to sleep on a gurney. They cut off their breasts. They sever their genitalia. They throw them in the trash. They then give them chemicals to alter their physiology. They are never the same again; disfigured, crippled. It was said earlier that today we confront evil. Members, this is evil. What I just described is gruesome, and it is diabolical, and it should end with your vote here today.”

Representative Black

Ex 30, 86:12-25

“In fact, what this bill actually does, it saves lives. . . . [G]ender transition actually kills. . . . That child, that son, that daughter, that brother, that sister that you once knew is no more. That person no longer exists. He changes his gender and is no more. This bill, what it actually does is it saves lives. It saves them. It doesn’t kill them. And it recognizes who they are in the eyes of God.”

Representative Borrero

Ex 30 (20:25), ECF 178-8 at 20

“We consider these procedures child abuse”

Representative Massullo