

EXHIBIT 6

CAUSE NO. _____

PFLAG, *et al.*,
Plaintiffs,

v.

GREG ABBOTT, *et al.*,
Defendants.

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IN THE DISTRICT COURT OF
TRAVIS COUNTY, TEXAS
_____ JUDICIAL DISTRICT

DECLARATION OF WANDA ROE

I, Wanda Roe,¹ hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and in all respects competent to testify.

I have personal knowledge of the facts set forth in this Declaration and would testify competently to those facts if called to do so.

2. I am a Plaintiff in this action. I am bringing claims on behalf of myself and as the parent and next friend of my son, Tommy Roe.

3. I also am a member of PFLAG, which is a Plaintiff in this action.

4. I live in Texas, along with my husband and my four sons.

5. My son, Tommy Roe, is 16 years old. I love him, support him, and wish to provide what is best for him throughout his life.

¹ Wanda Roe and Tommy Roe are pseudonyms. My son (who is a minor) and I are proceeding under pseudonyms to protect our right to privacy and ourselves from discrimination, harassment, and violence, as well as retaliation for seeking to protect our rights.

6. Tommy is transgender. When he was born, his sex was designated as “female,” even though he is a boy.

7. Throughout his childhood, Tommy has expressed himself and behaved in a manner that does not conform with the stereotypes associated with the sex he was designated at birth. At the time, he presented as a tomboy.

8. I have always permitted Tommy to express himself and explore who he is.

9. As Tommy approached puberty, he began questioning his gender identity and wondering if others his age felt the same way about their changing bodies. He discovered the term gender dysphoria, which refers to the distress, both physical and mental, that can result from a person’s gender identity not matching the sex they were assigned at birth.

10. In 2020, at the age of 14, Tommy informed me that he is transgender and that he had been struggling with his gender identity for approximately three years. He explained to me that he had been slowly coming out to friends and one of his brothers and that he had started going by a new, more stereotypically male name.

11. I immediately wanted Tommy to know that he was loved and supported so I hugged him. Because I was unfamiliar with what being transgender meant, I sought to become more informed. Over the week following Tommy’s coming out to me as transgender, I came to realize that Tommy is healthy, and he is safe as who he is, and that he is exactly the same person he was before he told me.

12. I sought guidance from a counselor and Tommy’s doctor on the best way to support Tommy and ensure his wellbeing.

13. Thereafter, Tommy began to socially transition by presenting as male publicly beyond the few people to whom he had disclosed he was transgender. We also began consulting

medical professionals and Tommy began working with a therapist as we explored the possibility of beginning gender-affirming hormone therapy. Indeed, as Tommy had been diagnosed with gender dysphoria, his doctors believed it was appropriate and medically necessary for him to start undergoing gender-affirming hormone therapy.

14. Since beginning his transition, I have perceived Tommy to be more confident through many aspects of his life, including in public and in private.

15. Being able to be affirmed as to who he is has brought Tommy significant relief and allowed him to thrive.

16. My commitment as a parent is to ensure the health, safety, and wellbeing of Tommy, whom I love and support.

17. Tommy returned to in-person high school in his sophomore year, after spending his entire freshman year in virtual classes as a result of the COVID-19 pandemic.

18. Witnessing my son's transformation has been awe-inspiring. Being able to present and be perceived as the boy that he is has allowed him to go from an uncomfortable, fearful child to a confident, self-assured young man.

19. On February 24, 2022, Tommy was pulled out class and called to the school's administrative office to meet with an investigator from the Texas Department of Family and Protective Services. Earlier that day, Tommy had texted me to inform me of the Governor's directive regarding investigation of parents of transgender children.

20. During this meeting, the investigator asked Tommy a series of personal questions, seemingly to probe whether he was undergoing gender-affirming medical care and whether he had been pushed to transition.

21. I picked Tommy up from school that day, along with several of his friends. Tommy had indicated to me that we wanted to talk to me after we dropped off his friends. During the car ride Tommy looked distraught and uncomfortable. I later learned this was because of the meeting with the investigator.

22. As we headed home, I received a call from one of my other sons that an investigator from DFPS was at the front door of my home, looking for me.

23. After consulting with my husband, we allowed the investigator into our home to interview our family. The investigator told me that the DFPS had been instructed to prioritize investigations into parents who provide gender-affirming medical care to their children over all other child abuse and neglect cases.

24. The investigator interviewed me, my husband, and Tommy's brothers. Tommy was so upset with the situation he had left the room. The questions related to our treatment of Tommy and probed whether we had ever abused him (we have not), forced him to transition (we did not), or forced him to take any drugs in support of his transition (we have not).

25. The investigator also asked about Tommy's medical history. Understanding we have done nothing but rather been loving and supportive of Tommy, as well as consulted with and relied upon the advice from medical and health professionals, I signed a release to allow the investigator to collect and review Tommy's medical records.

26. The interview lasted for approximately an hour.

27. Following the interview, I secured legal representation and days later revoked the release to allow DFPS to collect and review Tommy's medical records.

28. The issuance of the Attorney General's opinion and Governor's letter, along with DFPS's initiation of an investigation into our family, has caused a significant amount of stress,

anxiety, and fear for my family. For example, Tommy has been traumatized by the prospect that he may be separated from our family. My husband, Tommy's brothers, and I are also filled with anxiety and worry.

29. Since the interview, I have noticed that Tommy appears to be anxious and nervous more often than previously. He now worries that his statements to the investigator may be used as a pretext to take him away from his family, used to otherwise punish me or his siblings, or that he will not have access to the care his doctors have recommended as medically necessary and that would enable him to live more authentically as himself.

30. Following the interview, Tommy's performance at school took a dive and he became more reserved.

31. Tommy had difficulty focusing during school and tests, and his grades deteriorated significantly since the investigation. He struggled not only to focus on studying but also struggled in general to pay attention to his surroundings as a direct result of the stress he has experiences because of this investigation.

32. Our family found a measure of solace knowing that DFPS's investigation had been stopped as a result of a court through the beginning of May 2022. However, when that court order was narrowed to not protect our family, we began to fear the worst again.

33. Indeed, DFPS has contacted my attorney again and indicated that it is continuing with its investigation.

34. I feel that the investigation has violated the privacy of my family and, in particular, my son Tommy. The investigation pulled him out of classes at school, entered our home, and has made Tommy fear that harm may befall his family.

35. I worry about the potential physical and mental health consequences of depriving Tommy of the medically necessary treatment recommended by his doctors. Not providing such treatment is not an option for us. We believe providing Tommy with the gender-affirming care he requires is necessary to ensure his health and well-being.

36. I do not believe that there is any choice to deprive Tommy of the necessary, medically recommended health care that he requires. I would not deprive him of such care to avoid a finding that there is any reason to believe that I have committed “abuse” and the consequences that would follow such a finding based upon the DFPS’s implementation of the Attorney General’s opinion and the Governor’s letter.

37. We have lived in Texas for 12 years, and Texas is the primary home that Tommy has known. We chose Texas to be our home and want it to remain that way. Even if moving out of the state were feasible, we do not wish to do so if it can be avoided, as, among other things, it could mean the physical separation of our family, loss of employment, and separating Tommy from his long-term healthcare providers and friends.


38. Texas is our home. We are part of a community, comprising family and friends that have been supportive and affirming of Tommy’s identity. I worry not only about the multitude of harms caused to my own family through DFPS’s change in policy to investigate medically necessary gender-affirming care as a child abuse based on the Attorney General’s opinion and Governor’s letter, but also about the effect that the actions by DFPS, the Governor, and the Attorney General will have on other transgender youths, like Tommy, and their families.

39. Our family is as much a part of Texas as any other family, and Tommy has the same right to opening live with his identity as any other youth in this state.

40. The actions by DFPS, the Governor, and the Attorney General threaten the health and wellbeing of transgender youth like my son Tommy, and the integrity of other families like ours.

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

Executed this 6th of June, 2022 in Scotland.

DocuSigned by:

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Wanda Roe