## EXHIBIT 7

	CAUSE NO	
PFLAG, Inc., et al.,	\$ \$ \$	
Plaintiffs,	§ 8	IN THE DISTRICT COURT OF
	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	TRAVIS COUNTY, TEXAS
V.	§ 8	JUDICIAL DISTRICT
CDEC ADDOTT	§ §	
GREG ABBOTT, et. al,	<b>§</b> §	
Defendants.	§ 8	
	8	

## **DECLARATION OF TOMMY ROE**

- I, Tommy Roe, 1 hereby declare and state as follows:
- 1. I am over 16 years old, a minor, 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, with claims on my behalf being brought by my mother, Wanda Roe.
  - 3. We are residents of Texas.
  - 4. Our family is a member of PFLAG.
- 5. I am transgender. My birth certificate designated me as "female" when I was born, but I am a boy.

<sup>&</sup>lt;sup>1</sup> Tommy Roe and Wanda Roe are pseudonyms. My mother 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. Growing up, I was a tomboy. I did not really feel comfortable with the expected interests and gender expression of my sex assigned at birth.
- 7. As I got closer to puberty, I started to wonder if everyone felt the same panic and revulsion that I did when I looked at my changing body. My body seemed wrong and inconsistent with who I am.
- 8. Researching online, I found the term "gender dysphoria," and I realized that there was term for the discomfort and distress I felt.
- 9. I spent months trying to learn and to explore what pronouns felt right and consistent with who I am.
- 10. I knew I was not a girl but also felt cautious and apprehensive about learning that I was transgender.
- 11. I thought about the judgment I would face and that states, like my home state of Texas, were seeking to pass laws to take rights away from transgender people. I read stories about people getting kicked out of their homes, losing their friends, and facing stigma in their communities.
- 12. In the end, I could not ignore how right it felt when I thought of myself living as the boy that I am.
- 13. I told one friend that I might be trans and my friend responded positively, even asking me what name I wanted to go by.
- 14. It felt right and brought me a great sense of relief to be able to live as my true self and so I became more comfortable telling close friends and one of my older brothers that I was transgender.

- 15. In 2020, I finally worked up the nerve to tell my mom. I wrote a letter her explaining everything and watched her read it. When she finished, she hugged me, told me she loved me, and cried. After telling my mom, I told the rest of my brothers and my stepdad.
- 16. It took my family a little while to adjust but they have all been incredibly supportive and loving.
- 17. As I moved further into puberty, I felt even more distressed and anxious about the conflict between my body and who I am. In public, I would hide behind my mom, because I worried that someone would misgender me as a girl.
- 18. I would worry about whether I was walking femininely or whether my breathing sounded masculine enough. I avoided speaking in class and hid from my family and friends, staying alone in my bedroom, because my voice felt wrong.
- 19. Even in my room, however, I would still feel uncomfortable. It's a horrible feeling, just constantly being in discomfort. You cannot find solace even in privacy, no matter what you do.
- 20. Just before freshman year of high school, my family and I began working with a team of doctors and a therapist who diagnosed me with gender dysphoria. In consultation with these doctors and therapist, we began to explore the possibility of beginning gender-affirming medical care. Following this months-long process, doctors recommended gender-affirming hormone treatment as treatment for my gender dysphoria.
- 21. Throughout my freshman year, which occurred remotely due to the COVID-19 pandemic, I began to transition more fully to live and present as the boy that I am.

- 22. When sophomore year started, I attended high school presenting and living as the boy that I am. This was my first year of high school that was in-person, as my entire freshman year was virtual due to the COVID-19 pandemic.
- 23. My transition has allowed me to thrive, both academically and socially. I have more confidence in my everyday life.
- 24. My mom and stepdad have supported, and continue to support me, throughout my transition.
- 25. I first learned of the Attorney General's Opinion and the Governor's Directive online, though various posts on social media (like Instagram) and other posts on news websites. When I first learned of the Opinion and Directive, I was shocked and upset. I felt this was an attack on myself and others like me. I did not know how to react and was not sure the repercussions it would have for me and my family. Unfortunately, I quickly found out how these actions would directly affect my life and my family's lives.
- 26. On February 24, 2022, I was pulled out of class and called to my school administration's office to meet with an investigator from the Texas Department of Family and Protective Services. Earlier that same day, I had texted my mother about the Opinion and Directive.
- When I was called out of class, I was not told who I would be talking to but was simply sent to the school's office as if I were in trouble. When I arrived, a DFPS investigator was waiting for me. I did not ask to have anyone present with me while being questioned nor was I offered the opportunity to have anyone else present. I was shocked and confused by what was happening. The only people in the room were me and the DFPS investigator.

- 28. The investigator proceeded to interview me and asked me a series of deeply personal questions. I was told the interview was related to my home life but was not told the reason a call to CPS was made.
- 29. The questions were very personal, and asked about my family history, such as history of drug use, medications of my siblings, whether my mother had ever yelled at or hit me, and various other questions about my family and home life. The investigator did not seem familiar with myself or my family at all, as they were unaware of basic information about my family. The interview took about 20 to 30 minutes.
- 30. I just tried to answer the investigator's questions as honestly as I could, but I was nervous. I suspected the investigator was there because of the Opinion and Directive and I did not want it to seem like my family had actually done anything to me because they had not, and I worried that the investigator might try to twist my words.
- 31. After the interview, I was shaking and upset. I had missed close to half an hour of class time and did not know what to tell others about why I had been called to the office. While I was entirely truthful in my responses, I feared that the investigator would use my answers and, in some way, punish my family. A teacher noticed that I was upset and asked if I was alright; I told her about what had happened. I texted my mom I had something important we needed to discuss but did say what had happened, because I felt it should be discussed in person.
- 32. Later that afternoon, my mom picked me up and several friends up from school. Before I told my mom what had happened at school, we received a call from my older brother that there was someone waiting outside our home. My brother was freaked out about what was happening, as was I.

- 33. When we arrived home, an investigator, who I believe was the same investigator who had interviewed me at school, was waiting outside our home and asked to speak with my mom. My mom and stepdad decided to let them into the house. The investigator proceeded to interview my entire family, which was confusing and terrifying.
- 34. The investigator interviewed my mom, my stepdad, and my brothers. I was not present for these interviews, since I was so upset by what was going on that I had to leave for my bedroom. I was told afterwards about some of the questions that were being asked. I believe these questions generally tracked with the questions I was asked at school, related to my medical history, the possibility of abuse at home, and my family history.
  - 35. The investigator was at my home for about an hour.
- 36. 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 Directive has caused me a significant amount of stress, fear, and anxiety. The investigator violated my privacy at school and at home. I have always regarded my home as a safe haven and my safety was violated by the investigator's appearance there. My safety at school was also put at risk since I had no way to explain to my friends and peers why I had been so suddenly pulled out of class.
- 37. I worry that other students will talk about me and bully or harass me based on what has happened. I also worry that something I said to the investigator might give them grounds for further investigation and that I have somehow put my family at risk.
- 38. I feel that the investigation has violated the privacy of my family. The investigation pulled me out of class at school, entered my home, and made me fear that harm may befall my family.

- 39. Since DFPS pulled me out of class already, I fear that they may do so again, and I am powerless to prevent this from happening. As a result, I began to attend school remotely once again immediately following the interview and did so on and off for the rest of the academic year.
- 40. The fear of being outed and bullied because of DFPS showing up to my school had the effect of pushing me out of in-person school for a time, after I already had to miss so much in-person school during the pandemic. My anxiety and fear, related to the investigation as well as the threat of further investigations or interruptions of mine (and my family's) life have negatively impacted my social and academic success.
- 41. Though I managed to get my grades back up while DFPS's investigation was stopped by a court order, my grades deteriorated for a while following the interview as a direct result of the worry the investigation caused me. I pride myself on being a good student but following the initiation of the investigation I struggled to focus during class as well as studying. I had difficulty completing my assignments and I did poorly on tests that I would have done well on before the investigation.
- 42. The investigation by CPS has also had negative effects on not only my life but also my entire family. We have all been subject to unnecessary stress and anxiety as a result of the investigation into the alleged provision of gender-affirming care (which my doctors have recommended as necessary) due to 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 Directive.
- 43. I also fear what would happen if I were prohibited from obtaining gender-affirming medical care for my gender dysphoria, which my doctors have recommended as medically necessary. Being able to live as the boy that I am has brought me joy and happiness, and I fear

what it would mean to be forced to live in body that is not consistent with who I am. Puberty brought me so much stress and anxiety and forced me to be withdrawn. The prospect of being forced to endure that again scares me immensely.

- 44. Texas is my home. My family and I moved here when I was just a young child. We do not want to leave our home, nor do I want to be separated from my friends. However, we may have to if I cannot access medically necessary care recommended by my doctors as a result of DFPS's change in policy to investigate gender-affirming care as a child abuse based on the Attorney General's Opinion and Governor's Directive.
- 45. The actions by DFPS, the Governor, and the Attorney General threaten my health, safety, and wellbeing, as well as that of transgender youth like myself. They also threaten the integrity of families like mine.
- 46. My mom, stepdad, and brothers are loving and caring. They support me. They love me. And being able to live and be perceived as the boy that I am has made my life better and full of joy.
- 47. It is hurtful to know that DFPS, the Governor, and the Attorney General believe that I am wrong and that those who support and love me for who I am are wrong for doing so.
- 48. I am offended and hurt that my state government wants to make it unlawful for trans youth like me to be ourselves, and that DFPS, the Governor, and the Attorney General are willing to persecute families like mine simply for loving and supporting their trans children.

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

Executed this 6th day of June, 2022 in Scotland.



Tommy Roe