

No. 16-273

IN THE
Supreme Court of the United States

GLOUCESTER COUNTY SCHOOL BOARD,

Petitioner,

v.

G.G., BY HIS NEXT FRIEND AND MOTHER, DEIRDRE GRIMM,

Respondent.

On Writ of Certiorari
To The United States Court of Appeals
For The Fourth Circuit

**BRIEF OF TRANSGENDER STUDENTS AND ALLIES
AS *AMICI CURIAE* IN SUPPORT OF RESPONDENT**

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**STATEMENT OF INTEREST OF *AMICI CURIAE*
TRANSGENDER STUDENTS AND ALLIES¹**

Amici transgender students and their non-transgender classmates attend or recently attended secondary schools across the United States. These students are directly impacted by their schools' policies and practices regarding transgender students, and thus have a direct interest in the Court interpreting Title IX of the Education Amendments of 1972 to prohibit discrimination against transgender students.

As demonstrated by the personal histories of transgender *amici* related in this brief, transgender students' ability to access educational opportunities depends on whether they are treated consistently with their gender identity in all aspects of school life. Transgender *amici* who attended schools with inclusive and supportive policies that respected their gender identity excelled academically, socially, and personally. In stark contrast, transgender *amici* who attended schools without such supportive policies often suffered significant social, medical, and educational setbacks. Thus, transgender *amici* are directly affected by the issues in this case, the outcome of which will have a significant effect on their educational and social lives.

¹ The parties in this case have consented to the filing of this brief. Pursuant to Rule 37.6, *Amici Curiae* state that no counsel for a party has authored this brief, in whole or in part, and no person, other than *amici* or their counsel, has made a monetary contribution to the preparation or submission of this brief. A complete list of *amici* is included as Appendix A.

The stories of non-transgender *amici* related in this brief demonstrate that, despite what Petitioner and Petitioner's *amici* may claim, other students are not harmed by sharing spaces with transgender students. To the contrary, all students benefit from nondiscriminatory and supportive policies that embrace transgender students and promote a culture of understanding, acceptance, and inclusivity. Thus, non-transgender *amici* have an interest in promoting a supportive environment for their transgender classmates, which enhances their educational experience and prepares them to enter the diverse social and economic fabric of American civic life.

SUMMARY OF ARGUMENT

Transgender youth in schools across the United States routinely experience discrimination and harassment in their everyday lives. This discrimination causes significant harm to their educational and social development and well-being, and affects their ability to participate fully in educational, civic, and economic life. While a significant number of schools across the country are addressing this discrimination by adopting inclusive and supportive policies and practices, some schools refuse to acknowledge transgender students' gender identity, including by prohibiting them from using restrooms and other sex-specific facilities that reflect their gender identity.

Exclusionary policies like these discriminate against transgender students by preventing them from living consistently with their gender identity.

As described by other *amici* in support of Respondent, the medical and scientific consensus is that such exclusionary policies cause social and psychological distress to transgender people by stigmatizing and discriminating against them.

Being able to use restrooms that reflect one's fundamental identity is essential to one's social and psychological well-being. Indeed, the ability to live consistently with one's gender identity — including accessing restrooms and other sex-specific facilities — is a critical part of treatment for gender dysphoria, a medical condition from which some transgender people suffer that involves clinically significant distress caused by “the incongruence between one's experienced or expressed gender and one's assigned gender.” *See* Am. Psychiatric Ass'n, *Diagnostic and Statistical Manual of Mental Disorders: Gender Dysphoria* 451 (5th ed. 2013); *see also* World Prof'l Ass'n for Transgender Health, *Standards of Care for the Health of Transsexual, Transgender, and Gender Nonconforming People* 9-10, 58 (7th ed. 2012) [hereinafter “WPATH”] (recognizing that living consistently with one's gender identity, including the use of restrooms and other sex-specific facilities, is among the treatment options for gender dysphoria and among the criteria for certain surgical treatments for gender dysphoria). The transition process minimizes or eliminates the psychological distress often associated with gender dysphoria. *See* WPATH at 4-5, 9-10.²

² Recent research demonstrates that the distress associated with gender dysphoria is caused not by the fact that

Consistent with this scientific and medical consensus, many educators have adopted policies that protect transgender students from discrimination. For example, in 2016, the National Education Association declared:

It is essential to the health and well-being of transgender people for them to be able to live in accordance with their internal gender identity in all aspects of life and restroom usage is a necessary part of that experience. When transgender students seek to use private separate facilities, schools should grant access to such private facilities but transgender students should not be

a person is transgender, but rather because of the hostility directed at them because they are transgender. *See* Rebecca Robles et al., *Removing transgender identity from the classification of mental disorders: a Mexican field study for ICD-11*, 3 *Lancet Psychiatry* 850, 857 (2016) (distress is “more strongly predicted by experiences of social rejection and violence than by gender incongruence, consistent with the perspective that these reflect the result of stigmatization and maltreatment rather than integral aspects of transgender identity”); *see also* WPATH at 4 (anxiety and depression “are socially induced and are not inherent” to transgender status); Lily Durwood et al., *Mental Health and Self-Worth in Socially Transitioned Transgender Youth*, 56(2) *J. Am. Acad. Child & Adolescent Psychiatry* 116, 120 (2017) (finding normal levels of depression in transgender children who had already socially transitioned as compared to a control group of non-transgender children, in contrast to previous studies’ findings of “markedly higher rates of anxiety and depression and lower self-worth” among “gender-nonconforming children who had not socially transitioned”).

required to use these separate facilities.³

These educators have recognized that an accepting and supportive environment is a necessity for all young people, including transgender youth. *See* WPATH at 12; NEA Guide at 24. Transgender students' success in school is closely correlated with whether their administrators and teachers accept them for who they are, including allowing them access to sex-specific facilities consistent with their gender identity.⁴

Some schools, however, refuse to treat transgender students in accordance with their gender identity, causing significant harm to a

³ Nat'l Educ. Ass'n, *Legal Guidance on Transgender Students' Rights* 24 (June 2016), available at https://www.nea.org/assets/docs/20184_Transgender%20Guide_v4.pdf [hereinafter "NEA Guide"]. Likewise, the National Association of Secondary School Principals declared that "[u]nless the student has a preference for another option, transgender students have the right to use the restroom and locker room consistent with their gender identity." Nat'l Ass'n of Secondary School Principals, *Position Statement: Transgender Students*, available at <https://www.nassp.org/who-we-are/board-of-directors/position-statements/transgender-students?SSO=true> (last visited Mar. 1, 2017).

⁴ *See* Jenifer K. McGuire et al., *School Climate for Transgender Youth: A Mixed Method Investigation of Student Experiences and School Responses*, 39 *J. Youth & Adolescence* 1175, 1177, 1186 (2010) (recognizing the need for "a variety of strategies to increase comfort specifically for transgender youth," including the "accommodation of gender identity in dances, sports, physical education, locker room environments, and acknowledgement of name and pronoun preferences by faculty and on school records and identification" and finding "important associations between the actions schools take and the well-being of transgender youth").

vulnerable group of students who should be supported and accepted, not discriminated against and marginalized. Transgender students forced to endure a discriminatory school environment face harsh and long-lasting outcomes. A recent study by the National Center for Transgender Equality found that the majority of students identifying or perceived as transgender had “negative experiences, and that such experiences were correlated with a variety of poor outcomes, such as higher rates of attempted suicide, homelessness, and serious psychological distress.”⁵

Amici’s accounts demonstrate how critical it is to transgender students’ development and well-being to be educated in a school environment free from discrimination and that allows them to live consistently with their gender identity, particularly with respect to the right to access sex-specific restrooms and other facilities appropriate to their gender identity.

Several *amici* reported positive experiences in

⁵ S. E. James et al., *The Report of the 2015 U.S. Transgender Survey*, National Center for Transgender Equality at 137 (2015), available at <http://www.transequality.org/sites/default/files/docs/USTS-Full-Report-FINAL.PDF>; see also J. G. Kosciw et al., *The 2015 National School Climate Survey: The Experiences of Lesbian, Gay, Bisexual, Transgender, and Queer Youth in Our Nation’s Schools* at 85 (2016), available at [https://www.glsen.org/sites/default/files/2015 National GLSEN 2015 National School Climate Survey \(NSCS\) - Full Report.pdf](https://www.glsen.org/sites/default/files/2015%20National%20GLSEN%202015%20National%20School%20Climate%20Survey%20(NSCS)%20-Full%20Report.pdf) (75% of transgender student respondents reported feeling “unsafe” because of their gender identity, 64.5% reported verbal harassment, 24.9% reported physical harassment, and 12% reported physical assault).

school after coming out as transgender. Those students' administrations and teachers supported them, allowed them to use facilities consistent with their gender identity, and, consequently, fostered an environment in which transgender students thrived socially and educationally.

Many other students, however, were forbidden from using facilities consistent with their gender identity. They were often forced to use a restroom segregated from their classmates, or required to use facilities inconsistent with their gender identity and appearance. Such policies involuntarily "outed" these students as transgender (*i.e.*, revealed their transgender status) to fellow students and often subjected them to increasing levels of harassment and violence. To avoid the embarrassment and stigma of having to use single-user restrooms or facilities that did not reflect their gender identity, these students often avoided using restrooms entirely during school, leading to discomfort and harmful medical consequences such as urinary tract infections and severe dehydration.⁶ Some students have missed classes or avoided attending school,

⁶ Experiences like these are unfortunately well documented among transgender people. *See, e.g.*, Jody L. Herman, *Gendered Restrooms and Minority Stress: The Public Regulation of Gender and its Impact on Transgender People's Lives*, 19 J. Pub. Mgmt. & Soc. Pol'y 65, 75 (2013) (54% of transgender respondents reported medical conditions related to restroom usage, including dehydration, urinary tract infections, and kidney infections); Mark A. Schuster et al., *Beyond Bathrooms — Meeting the Health Needs of Transgender People*, 375(2) New Eng. J. Med. 101, 101 (2016) ("Delayed bathroom use can cause health problems including urinary tract or kidney infections, stool impaction, and hemorrhoids.").

suffering academically and socially as a result. Some students also developed severe anxiety, depression, feelings of worthlessness and suicidal ideation, and engaged in self-harm.

Those who oppose allowing transgender students to participate in school consistent with their gender identity often claim that transgender students' use of sex-specific facilities appropriate to their gender identity violates the privacy of non-transgender students. But the accounts of *amici* demonstrate otherwise. As one non-transgender *amicus* stated, a transgender girl's use of the girls' restroom does not invade anyone's privacy "any more than [a non-transgender] girl would." In fact, contrary to claims by Petitioner and Petitioner's *amici*, it is only when transgender students are forced to use facilities inconsistent with their gender identity and appearance that privacy issues arise. Indeed, multiple *amici* report that their non-transgender classmates or parents of other students express confusion as to why transgender *amici* are in restrooms inconsistent with their gender identity and appearance. In some cases, transgender students were physically blocked from entering restrooms that corresponded to their sex assigned at birth, as is often required under exclusionary school policies. It is plain that hypothetical privacy concerns starkly contrast with the very real and lasting harm that exclusionary policies inflict on transgender students. These policies discriminate against transgender students based on their gender identity, contribute to bullying and harassment, and deprive them of the right to participate fully in all aspects of school life.

ARGUMENT

Many educators have come to understand that it is necessary to the health and well-being of transgender people for them to live, and be treated, consistently with their gender identity in all respects, including accessing sex-specific facilities. *See* NEA Guide at 24. The experiences of *amici* recounted below bear this out.

I. SUPPORTIVE POLICIES AND SCHOOL ADMINISTRATIONS DRAMATICALLY IMPROVE TRANSGENDER STUDENTS' LIVES AND EDUCATIONAL EXPERIENCES

The following transgender *amici* from across the United States reported that their school administrations and teachers were fully supportive and treated them in accordance with their gender identity in all respects. Their schools adopted inclusive policies, updated official school records to accurately reflect their names and genders, and permitted them to access facilities consistent with their gender identity. The support they received fostered an environment that enabled them to succeed at school and promoted their social and mental well-being.

Brandon Adams, Framingham, Massachusetts

Brandon Adams, pictured below, is a 15-year-old transgender male student in tenth grade at Norfolk County Agricultural High School.



Brandon came out as transgender in eighth grade. While his immediate family and many of his friends were supportive, Brandon explained that he “lost a good amount of friends” and “was bullied and harassed pretty bad” at school, including verbal and physical harassment. Brandon’s middle school did not allow him to use facilities consistent with his male gender identity. Instead, he was instructed to use a nurse’s restroom located in a hallway regularly used by his classmates. This “outed” him to his classmates, teachers, and staff who did not know he was transgender, and prompted further harassment from other students. Brandon “felt alienated,” and it was “really terrifying” for him to “fe[el] separated from everyone else.” Eventually, Brandon stopped drinking water during the day to avoid using

restrooms entirely, causing dehydration. The lack of support from the school and continuous threats and harassment caused Brandon to fear going out in public.

Brandon's experience improved dramatically in his high school, which unequivocally supported him from the start. Brandon explained:

They were amazing. ... [B]efore I even started to attend, they called us ... [and said] this is how [it is] going to be set up. Your name is going to be Brandon Adams on all of the papers so if you get called like for attendance and everything, you have your name even though it's not legally changed, that's what you're known as here. You're a male on all of the records here. You can use the boys' locker room, use the boys' bathroom. Try out for any team you want. Use whatever bathroom you want. ... They were really accepting. And I was shocked, honestly, because middle school wasn't the best experience for me.

Although some of Brandon's classmates initially "had questions" about what it meant to be transgender, his classmates have become accepting and Brandon has not experienced any issues with using the boys' restroom or locker room, where Brandon changes for gym class.

Brandon's academic performance improved in this new environment. Brandon explained that "all

of [his] teachers are supportive,” he is “more focused on [his] school work,” and “has a great social life with the students at [his] high school.”

Nonetheless, Brandon’s negative middle school experience still affects him. Brandon continues to fear how people may react when they “figure[] out that [he is] transgender.” Brandon stated:

[E]ven at my [high] school, even though I feel safe and accepted, I still am scared that someday a student is going to get upset ... and hurt me. And that’s something that I’m living with and have to deal with, which is pretty sad.

The support Brandon now receives has enabled him to continue his transition and succeed at school. Brandon has been receiving hormone therapy since April 2016 and recently underwent a surgical procedure as part of his transition. Consistent with the WPATH standards of care (described above at 3), Brandon’s progress is due in large part to his ability to live his life authentically as male, both at home and in school. Brandon plans to go to college and is considering law school because “I’ve always had that part of me that wants to advocate for people.”

Evie Priestman, Arlington, Virginia

Evie Priestman, pictured below, is a 17-year-old transgender male student in twelfth grade at Wakefield High School.



Evie came out as transgender his second week of high school by standing up “in front of each class” and declaring, “My name is Evie. I happen to be transgender, and I would like to be addressed by male pronouns.” Evie says he “was supported 100%, both by peers and by teachers.” Although Evie received some questions on what it meant to be transgender and how the school and his classmates could support him, he “was very open around it ... [a]nd from then on, I was supported by my peers and teachers.”

When Evie came out, his school did not have a policy addressing the use of restrooms and locker rooms by transgender students, and the administration initially required Evie to use a nurse’s restroom far from classes that needed to be unlocked by a staff member each time he needed to use it. This forced Evie to “go out of [his] way just to use the restroom while there was a restroom maybe five feet away” from him, took “time away from [him]

being in class” due to the restroom’s distance, and isolated him from his classmates. Evie was also required to change for gym class in a separate teachers’ restroom that needed to be unlocked for him before and after every class.

Due to advocacy by Evie and his family, his high school established formal policies during Evie’s sophomore year allowing transgender students to use the restrooms and locker rooms consistent with their gender identity. Evie stated that in the two years since the policy has changed:

I feel more confident with myself knowing that I could just ... use the restroom ... without walking the three flights down the stairs to the nurse’s bathroom. ... I am also able to connect with peers in the hallway more frequently now and ask maybe some homework questions and maybe just catch up on what’s happening in their lives that day.

Evie also observed that the policy change allows other transgender students at his high school to come out at school on their own timeline “without having to be ‘outed’ as trans by going into [a separate] restroom and having people see.” According to Evie, there are no issues with his use of male locker rooms:

You go in, change, you get out. There’s not much talking. ... [O]bviously there are stalls for people when they have to go

to the bathroom. People were able to change in those stalls and close the stall door. ... [B]ut from my experience no one actually pays attention to who changes or who changes outside of the stall and I feel like the community I'm in definitely, they respect each other's body and how they feel about their body and if someone needs to change in the stall and they don't feel comfortable with people seeing their body then it's okay. ... No negative feedback.

As Evie's experience reflects, inclusive policies are an essential form of support for transgender students, and restroom and locker room usage — like using correct pronouns and names — “just goes along with supporting a trans individual.”

Evie's support both at home and at school has allowed him to thrive. He is applying to college and is interested in “continuing [his] activism work within the college campus [environment] ... and rais[ing] awareness of trans individuals and reduc[ing] the stigma” that transgender people face in their everyday lives.

Nicole Talbot, Essex, Massachusetts

Nicole Talbot, pictured below, is a 15-year-old female transgender student in ninth grade, and an aspiring Broadway actress and singer.



Nicole’s experience reflects how inclusive policies can dramatically affect outcomes for transgender students. Nicole came out as transgender in seventh grade. She met with school administrators and received their full support. Administrators attended an educational conference on transgender youth in schools, consulted with other schools, researched how to create an environment where transgender students feel “safe, supported, and fully included,” and provided training for the administration, faculty, and staff to educate them about the transgender community. Nicole recalls the middle school’s Head of School telling her: “You are making me a better Head of School and you are making our school a better place for all the students here now and those for many years to come.” The school set expectations for inclusivity and tolerance for the student body, and

Nicole was given access to all facilities and activities consistent with her female gender identity, including the girls' restrooms and locker rooms, which she has used without incident.

Now in high school, Nicole has been "treated as a girl across the board" in all aspects of her school experience, including extracurricular activities, overnight school trips, and casting in shows and musicals. She is allowed to use the girls' restroom, locker room, and dressing rooms.

This supportive school environment did not come without a cost to her family. Nicole has special education needs as a result of her severe dyslexia. After Nicole completed middle school, only two Massachusetts high schools were viable options. While applying, it became clear to Nicole that one of the schools would not be supportive of her gender identity and would force her to use the boys' facilities. Although that high school was closer to home and had an exceptional theater program, Nicole chose the school with inclusive and nondiscriminatory policies. Nicole's family had to make significant sacrifices to allow Nicole to attend a supportive school environment, including moving to a new city closer to the school. As a result of the support Nicole receives from her school, she carries an A average in all of her classes and is thriving.

Nicole views her use of the girls' restroom as routine and unexceptional:

We are just in there to go pee. For me, to fix my makeup, put more perfume on, fix

my hair, to make sure I am all good. I am not invading anyone's privacy. Overall I feel like, for me, I am the one that is hiding from everybody else to make sure that no one invades my privacy.

Leif Taranta, West Chester, Pennsylvania

Leif Taranta, pictured below, is a 19-year-old transgender male student who recently graduated from the Westtown School in Pennsylvania.



Leif came out as transgender as a sophomore at the Westtown School, after transferring from another high school where he was ostracized and mocked by his classmates because he looked like a “stereotypical boy” from a young age. When he came out at Westtown, Leif approached the administration because he felt “very uncomfortable using the girls’ bathroom” and living in the girls’ dormitory given

his male appearance. Although the school had no policy regarding facility usage, it refused to allow Leif to use the boys' restroom for fear of "making people uncomfortable." Leif was forced to use a faculty restroom in a separate building during the day and, after school hours, was required to use the girls' restroom. These policies made Leif feel "extremely uncomfortable" and he "had difficulty functioning because [he] was stressed out about having to go to the bathroom," would "hold it all the time," and "was psychologically having trouble because [he] was told that everyone else's comfort was more important than [his] ability to go to the bathroom."

With the support of his family and the school's psychologist, Leif worked to change the school's policy. By Leif's senior year, his school adopted a policy allowing transgender students to use restrooms and live in dormitories consistent with their gender identity. Leif explained that once the policy was in place, "they let me use everything and it was fantastic. And there were no problems at all." Although he had heard abstract concerns about student privacy before the policy changed, there were no actual problems after the policy was enacted. Leif explained: "When I go into a restroom, it makes *me* uncomfortable [because I feel] that I'm not like all the other guys. I never let anyone see me because of that. And when I finally told some people I was trans, they [said] 'oh really? I had no idea.'" Leif believes policies that prohibit transgender students from using sex-specific facilities according to their gender identity are "ironic" because "I shouldn't be going into the women's bathroom"

because “[t]hat’s a women’s space ... [and] well, I’m not a woman.

These supportive policies have allowed Leif to succeed at school. He stated: “I could function again because I was able to go to the bathroom without being discriminated against.” Leif’s energy and enthusiasm for school increased, allowing him to excel in his classes and become a leader in extracurricular activities. Leif’s teachers and friends commented that he “seemed so much happier, more efficient, and able to get things done.” Leif’s administrators told him: “you were the first [transgender student], [and] now that we have a policy in place, it is so much easier.”

Leif graduated with high grades, received a merit scholarship, and is now a freshman at Middlebury College in Vermont, where he is treated in all respects as male. Leif plans to continue advocating for education on transgender issues while pursuing his post-secondary education.

Siddy Greenstein, Bethesda, Maryland

Sydney “Siddy” Greenstein, pictured below, is a 13-year-old transgender male in seventh grade.



Siddy came out as transgender to his classmates when he was 12 years old by standing in front of the entire class and explaining that he was transgender and would be using male pronouns going forward. Siddy’s family, friends, and classmates were all “very supportive” and “no one said anything negative at all.”

Siddy’s middle school allows him to use male restrooms and locker rooms. The administration “showed [him] the male bathrooms and locker rooms and took the time to make sure that [he] was okay.” Siddy reports that “none of the other students have had any problems” with this policy and “nobody really notices it ... and if they do notice it, they don’t try to make anything out of it.” This support has been “very incredible” for Siddy.

Before Sidy came out at school, he felt anxious when using the girls' restroom because he was a "guy going into the girls' bathroom." Using a girls' restroom "shattered [his] self-image" and made him think, "you're wrong about everything." As a result, Sidy limited his restroom usage as much as possible. This caused him to "zone out" in class and imagine "a world where ... everything [he] didn't like about [him]self was gone." Sidy described this period as a "horrible thing to go through."

Sidy says using facilities that matched his gender identity "felt like this weight of years and years of pretending and acting like someone [he] wasn't was gone."

* * * * *

These accounts make plain that transgender students thrive academically, socially, and personally under inclusive and nondiscriminatory school policies, and are able to live their lives without worrying about how others perceive their gender identity every time they perform the most basic, everyday functions.

Other *amici* reported similar experiences. Maxwell Platt, a 12-year-old transgender male student in sixth grade in Arlington, Virginia, stated that when his school implemented supportive policies allowing him to use sex-specific facilities in accordance with his gender identity, he noticed a new climate of "change and acceptance" among his classmates who began treating him more respectfully. His grades improved and he began

participating in extracurricular activities that he previously avoided.

Similarly, Maddie Dalton, an 18-year-old transgender female student in twelfth grade in Louisville, Kentucky, reflected on how the school's "proactive" approach to inclusivity "set[] the tone for how supportive the administration was." Maddie stated that the few objections to the new policy came not from other students, but from parents and outside groups with no affiliation to her school. Her school refused to bow to the pressure, and Maddie was permitted to use the girls' restroom and locker room consistent with her female gender identity. She explains that her school's formal policy allowing her to use appropriate facilities has created an environment where "you just [use the facilities like everyone else] and nobody bats an eye."

Supportive school administrations also improve transgender students' mental and emotional health. Kate Brown, a 16-year-old transgender female in eleventh grade in Alexandria, Virginia, credits her school's inclusive policies with a dramatic improvement in her depression and gender dysphoria. She stated:

Once I started [living as the girl I am] full time, I started to feel way better about myself. ... I was allowed to feel pretty. And it was kind of an eye opening experience that felt like a fog had lifted in a sense. Just because I wasn't feeling crushed 24/7 by heavy, heavy depression.

Kate's classmates have likewise grown to accept her for the girl that she is, including in the locker room. Kate notes that, although she is often "not very comfortable changing in front of other people [and] so just [goes] to the stall" to change, "even when [she] change[s] out in the open, no one sa[ys] anything; there [are] no odd looks."

Zay Crawford, a 14-year-old transgender female student in eighth grade in Yellow Springs, Ohio, credits her school's nondiscriminatory policies with ending the severe anxiety and difficulty focusing on schoolwork that she suffered at her previous school: "[I felt] very relieved that I wouldn't have to be sitting in class with the anxiety about using the bathroom and I wouldn't have to be afraid." Zay's classmates have had no issues with her use of female restrooms or locker rooms: "[We] change in the bathroom stalls and ... would just go talk and then put our stuff in the locker ... we just kind of all wanted to change, chit chat, do our business, and leave."

II. DISCRIMINATORY POLICIES SIGNIFICANTLY IMPAIR TRANSGENDER STUDENTS' EDUCATIONAL EXPERIENCES AND MENTAL AND SOCIAL HEALTH

In stark contrast to the experiences of the students recounted above, other *amici* reported that they were faced with discriminatory school policies and administrations that prohibited them from living in accordance with their gender identity. Although these students come from different

backgrounds and places, their stories are remarkably similar and demonstrate that unsupportive school policies damage transgender students' personal, mental, and social well-being, impair their educational development, and deprive them of the benefits of a complete education.

Kennedy Jones, Berryville, Arkansas

Kennedy Jones, pictured below, is an 18-year-old transgender male who graduated from high school in Arkansas in May 2016.



Before Kennedy transitioned or even understood what being transgender meant, he “felt like I was being something that I wasn’t ... when I looked in the mirror I didn’t see myself, I saw

something else and I didn't understand why I couldn't be like everyone else ... which triggered a lot of self-dislike." Kennedy realized he was transgender and came out to his immediate family and close friends at age 15.

Kennedy's school was largely unsupportive. It prohibited him from using restrooms and other facilities for male students. Being forced to use restrooms for girls was uncomfortable and stressful for Kennedy and affected his ability to focus on school work. Initially, Kennedy tolerated this untenable arrangement because he knew the school district's superintendent was unsupportive and Kennedy was worried he would be bullied and harassed for using the men's restrooms. Soon, however, Kennedy was bullied for using the *girls'* restroom, as required by the school. Kennedy stated that in one incident at the beginning of his senior year, a group of female students physically barred him from entering and "told [him] that [he] was in the wrong bathroom."

After this embarrassing incident, Kennedy's high school guidance counselor allowed him to use a single-user restroom in the school's main office, which was located far from Kennedy's classes. This caused Kennedy to be tardy to classes and "outed" him as transgender to his classmates because Kennedy had to explain to teachers in class why he was consistently late. Kennedy felt "singled out." Other students "didn't have to think about [using the restroom] and yet here I was having to do this on a day-to-day basis." Kennedy stopped drinking water during the school day to avoid having to use the

restroom at all.

Kennedy nevertheless persevered and graduated. Kennedy's life improved after graduation. Now he is able to live fully in accordance with his gender identity. He works as a freelance artist, which pays for his living and medical expenses as he continues his transition.

Travis Sawyer, Tacoma, Washington and New York, New York

Travis Sawyer, pictured below, is an 18-year-old transgender male originally from Los Angeles, California who recently transferred to Harvey Milk High School in New York City.



Travis first came out as transgender when he was 15 and living in California. For family reasons, he moved to Washington State where his sister-in-

law supported his transition. Most students in high school were unaware Travis was transgender until he was “outed” by a student who loudly asked Travis vulgar personal questions in front of the entire cafeteria. Travis recalls that the school “started becoming kind of a hostile environment,” and he became “afraid to be at school.”

After Travis was involuntarily “outed,” a school security guard blocked him from using the boys’ restroom unless he produced a “formal letter,” but Travis was never told what sort of letter would be required. This led to students “threaten[ing] [him] about using the bathroom.” Although the school eventually allowed Travis to use a private restroom, Travis had to request a key from a teacher each time he needed to use it, and, occasionally, access to even that restroom was inexplicably restricted. Travis explained: “there was no definite way of knowing if I was going to be able to have access to a restroom that day. So I had to plan according to that.”

This experience affected Travis deeply. He ultimately avoided using restrooms entirely while at school, avoided drinking water, and suffered academically. Travis stated:

My grades really fluctuated a lot ... I was a really good student at the school, I had A’s ... but whenever certain things were happening you’d ... see my grade[s] suddenly drop and they would stay like that for a significant time. ... [D]uring those times I would either come late or I

would avoid certain classes. ... [It] was very unhealthy mentally there.

The school also failed to respond to bullying. Travis believed that his school was “more bothered by the fact that I was there” than by other students’ harassment of him, and “once [other students] realized the school wasn’t going to do something about it,” they felt emboldened and increased their bullying.

These experiences caused Travis to move with his mother to New York City during his junior year. He now attends Harvey Milk High School, which fully supports transgender students in every respect. Travis’s school has “helped me to feel that despite being trans I’m still very much myself.” He is more self-assured and self-confident and is doing “a lot better in school.”

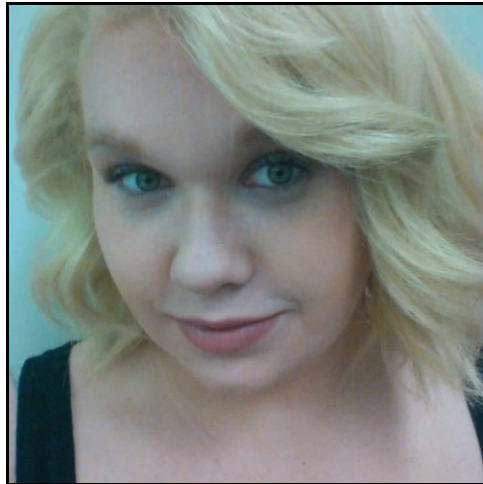
Travis believes fear and ignorance underlie policies that prevent transgender individuals from using restrooms according to their gender identity. Travis explained:

I think people overthink things until it becomes an issue far beyond what ... they are afraid of. ... [I]f they look back at evidence ... no one’s really been attacked by a transgender person. It’s actually the opposite. ... And I think it’s really unfair to project these fears because it stops people from actually looking at what’s actually happening. And it’s making a lot of [transgender] people terrified to go to

school or do things that could help further their career as a student because they're afraid of going to the restroom.

Emma McQueen, Clearfield, Kentucky

Emma McQueen, pictured below, is a 16-year-old transgender female attending high school in Kentucky.



Emma came out as transgender during her first year of high school. Many of Emma's friends have been supportive but the response from other classmates and the school administration has been negative. Students harass and bully Emma because she is transgender, while the school looks the other way. Emma is routinely called by her birth name rather than the name she uses, derogatory slurs are hurled at her, students refer to her as "it," and students have even destroyed Emma's property, including binders for her schoolwork. Yet the administration ignores these incidents. Emma

explains that the school's failure to respond "just reinforces that the school is behind [the bullying students] and they can really just do anything."

Although Emma previously was permitted to use a staff restroom, Emma's school currently prohibits her from using either the girls' restroom or the staff restroom. This leaves her with no options because she cannot use — and does not feel safe using — the boys' restroom given her female gender identity and female appearance. Recently, a theater teacher began allowing Emma to use the theater restroom when their schedules permit, but to use this restroom she must walk approximately a quarter mile across campus, a trip that takes longer than Emma's five-minute break between classes.

The school's policy causes Emma to be late to class every time she uses the restroom. It also humiliates and stigmatizes Emma and "outs" her as transgender to other students because she must ask a teacher for permission before going to the theater restroom and must walk past the restroom that all the other girls use. The school's policy extends through after-school hours, which prevents her from participating fully in extracurricular activities. In one incident, Emma was suspended for using an empty girls' restroom during her afterschool marching band practice, when she was unable to access any other restroom. To avoid the humiliation and stigma, Emma started avoiding drinking water to limit how often she needed to use the restroom, placing herself at risk for medical complications.

During Emma's junior year, she requested

access to the girls' restroom and referred the school's administration to the Fourth Circuit decision in this case in favor of Respondent, *G.G. ex rel. Grimm v. Gloucester Cnty. Sch. Bd.*, 822 F.3d 709 (4th Cir. 2016). Her request was denied and, in what Emma believes was a retaliatory move, the school stripped her and another transgender student of access to the staff restroom they previously used. Emma is baffled by the school's treatment, since other students do not care what restroom Emma uses. Emma stated, "the majority of girls [at her school] will tell me, 'I don't care if you're in the bathroom.'"

Emma's high school is so hostile that she has decided to complete high school through an alternative learning program next year. Emma will be schooled at home, though she will still be technically enrolled as a student. Emma would prefer to be in school with her classmates but this is simply not an option. Emma explained: "I've been able to handle it for the past three years but it is starting to break me down. This last week I woke up and my entire pillow [was] soaked. I end up just crying in my sleep."

Despite the adversity Emma has faced, she remains ambitious and hopeful. Emma is an avid chef and plans to attend culinary school after graduating.

Cameron Rogers, Memphis, Tennessee

Cameron Rogers, pictured below, is a 17-year-old transgender male high school student in Tennessee.



Cameron came out to his mother and close friends at the age of 13. His middle school refused to respect his gender identity. Although Cameron reported his transition to the administration, when he arrived at school wearing the school's uniform for boys, Cameron's principal stopped him in front of the other students and lectured him that he was "not allowed at school" in the boys' uniform and forced him to leave. Cameron felt "embarrassed and ... very hurt that [he] had to go home over something so trivial." Cameron's middle school also refused to investigate incidents of harassment against Cameron, including bullying and the theft of Cameron's phone and textbooks.

Cameron avoided using restrooms entirely in middle school. Using the boys' restroom was not an option because of the school's refusal to treat

Cameron as a boy, and using the girls' restroom was not an option because of his male gender identity and appearance. Cameron avoided drinking water during the school day and suffered from bladder infections. The middle school's treatment of Cameron affected his ability to concentrate and hindered his academic success.

Cameron has also faced an unsupportive environment in high school. Transgender students like Cameron are not permitted to use facilities appropriate to their gender identity. The school failed to address a verbal threat directed at Cameron in which a student said, "If I find out someone in this school is trans I'm going to kill them." Another transgender student was forced to drop out after she was attacked by other students, "had her hair pulled, [and] was shoved into walls" when attempting to use the restroom. Cameron says, "I normally go through school scared," and his focus at school now is "surviving as much as possible." Nonetheless, Cameron has high hopes for his future. He plans to study psychology in college and become an educator on LGBT issues.

Marilyn Morrison, Grapevine, Texas

Marilyn Morrison, pictured below, is an 8-year-old transgender female in third grade.



As early as Marilyn can remember, she has known she is a girl and has used female facilities in public. Marilyn began transitioning in school in third grade, but when Marilyn's mother contacted the school guidance counselor to inform her that Marilyn is transgender, the school was not supportive. The school ultimately forced Marilyn to use a separate staff restroom in the school's library, which "outed" Marilyn to students and teachers who did not know she was transgender, humiliated her, and frequently caused her to be late to class. Some of Marilyn's teachers, refusing to take into account how far the staff restroom is from Marilyn's classroom, reprimanded Marilyn for being late or at times even refused to allow her to leave class to use the restroom. Some staff members even stopped Marilyn from using the library staff restroom

entirely, apparently unaware that the administration had allowed Marilyn access.

Eventually, after she was barred from using the staff restroom on several different occasions, Marilyn began using the girls' restroom near her classrooms. Marilyn's teachers reacted by accosting her and asking where she was going, which humiliated Marilyn. The school's principal informed Marilyn's mother that Marilyn could face disciplinary action if the mere fact of Marilyn's use of the girls' restroom "interrupted anyone else's learning."

Marilyn also faced daily bullying that the school ignored. When Marilyn complained, it was dismissed by the school and characterized as "just a misunderstanding." Marilyn developed headaches and stomachaches from the stress of the constant bullying. Marilyn stated that other students "said I was disgusting, they said their families were disgusted by me and that I should move." Marilyn does not understand the source of this hostility, stating, "I'm just trying to learn ... We're all human. We're all the same. It's not like some of us are aliens from Krypton or something."

Unfortunately, shortly after starting third grade, the school's lack of support, failure to provide Marilyn with access to appropriate facilities, and the relentless and unaddressed bullying, forced Marilyn to un-enroll from the school. She is now being homeschooled until her family can find a school that will respect Marilyn's female gender identity.

* * * * *

The experiences of these *amici*, and similar experiences of numerous other *amici* interviewed for this brief, demonstrate that discriminatory and exclusionary school policies cause transgender students to be stigmatized, humiliated, and “outed” as transgender to their classmates, lead to medical complications such as urinary tract infections and dehydration when they stop drinking water or avoid restrooms altogether, and cause some students to skip school entirely to avoid this humiliating and painful experience. As a result, these exclusionary policies significantly impair transgender students’ ability to receive an education.

Rowan Wooldridge’s account is illustrative. Rowan, a 17-year-old transgender male attending high school in Virginia, explained that his school’s refusal to allow him to use the boys’ restrooms or a staff restroom that was “always locked” “took a huge toll on my mental health and therefore my school work.” Last year, Rowan “miss[ed] several days of school because [he] wasn’t mentally healthy enough” to attend, due to the ongoing discrimination he faced. When Rowan returned to school, he “refuse[d] to drink water for a very long time so that [he] could avoid using the bathroom at all ... [and] was very dehydrated for a very long time, which made it harder to keep up [his] grades.”

Discriminatory policies and administrations also often lead to increased bullying, harassment, and even physical violence. Kayden Ortiz, a 19-year-old transgender male who recently attended high

school in Virginia, stated that his high school's discriminatory restroom policy repeatedly "outed" him as transgender and that the "bullying was definitely more rampant because of the school's lack of support." The bullying Kayden faced was so severe that he feigned illness to avoid school and "pretended to throw up because [he] had so much anxiety about attending school," all of which "really ramped up [his] gender dysphoria."

Dylan Kleiman, a 14-year-old transgender male student in Alexandria, Virginia, stated that his middle school refused to call him Dylan and required him to use the girls' restroom at school despite his male appearance, speculating that other students might otherwise feel "uncomfortable" and parents of other students would "complain" if they discovered that a transgender male was using boys' restrooms. The school also failed to address harassment against Dylan. He suffered from depression and anxiety, his grades dropped, and he "started self-harming." Dylan stated: "I thought I deserved it because I was not good enough, not passable. I thought it was my fault for not having an ideal male physique."

Amici's experiences also reveal that policies forcing transgender students to use facilities inconsistent with their gender identity and appearance can lead to confrontation with non-transgender students or parents who are unaware that the student is transgender. While using the girls' restroom (as required by his school), Dylan Kleiman was confronted by the parent of another student who complained there was a "man in the girls' bathroom." Kennedy Jones described an

incident where he tried to use the girls' restroom, as required by his school, but was blocked from entering by a group of students who told him he was "in the wrong bathroom." Lily Crane, a 15-year-old transgender female student in Park City, Utah, explained that "[i]t would throw a lot more people off going into the guys' bathroom [rather than] the girls' bathroom" and "I would probably be physically scared for my well-being because I don't look like a guy." Experiences like these are all too common in schools with exclusionary policies, which effectively deny transgender students access to any restroom, and illustrate why this Court should interpret Title IX to prohibit such discrimination against transgender students.

III. NON-TRANSGENDER STUDENTS ARE NOT HARMED BY SHARING SPACES WITH TRANSGENDER STUDENTS AND IN FACT BENEFIT FROM INCLUSIVE AND NONDISCRIMINATORY POLICIES

When objections are raised to sharing sex-specific spaces with transgender students, it is most often not transgender students' classmates who express such concerns, but a minority of parents or other adults who do so. Whatever their origin, these concerns are unfounded. Sharing sex-specific spaces with transgender students neither harms non-transgender students nor violates their privacy. To the contrary, all students benefit from inclusive and nondiscriminatory policies that embrace the differences among students and promote a culture of understanding, acceptance, and inclusivity.

Several *amici* are non-transgender students who have transgender friends and classmates. They attend the same classes, socialize and eat lunch together, and use the same restrooms and locker rooms. These *amici* explained how policies regarding restroom access affect how transgender students are treated by their classmates. Tori Partridge, a 17-year old non-transgender student attending high school in Alabama, observed this effect first-hand. She reported that her friend, a transgender male, “blossomed as a person” when he entered a high school where he “could use the male restroom,” and suffered from far less bullying. The culture dramatically improved with the change in policy. Tori stated that “when students see adults doing something, it’s deemed ok. ... In middle school, they thought it was ok to treat him [badly] ... in high school there’s so many people who are accepting of him as a male.”

Abby Garske, a non-transgender twelfth grader in Illinois, believes that discriminatory policies of exclusion cause transgender students to feel stigmatized and send an official message that discrimination against transgender students is acceptable. As Abby described them, exclusionary policies “ostracize[] and alienate[]” transgender students by “saying to them ... you’re different and don’t belong.” Joseph Rue, a non-transgender high school student in West Chester, Pennsylvania, reported that a change in school policy allowing transgender students to access facilities appropriate to their gender identity caused his classmates to view his friend and fellow *amicus* Leif Taranta differently: “Once [Leif] gained access to the

restrooms I would say that was ... the point where he became ... socially [accepted] as a male in the community. Before that, he identified as that way but he was stuck in limbo.”

Non-transgender *amici* also noted that excluding their transgender friends and classmates could not be justified based on concerns about privacy. Sarah Lore, a 16-year-old non-transgender high school student in Alexandria, Virginia, believes that forcing transgender students to use restrooms that do not match their gender identity is what creates a privacy issue. She stated: “I don’t see how [a transgender girl using a girls’ restroom] is invading [] privacy any more than the [non-transgender] girl would be invading their privacy.” Nor does Abby Garske feel as though her privacy is invaded when female transgender students use the same restroom as she does. Abby explained that this “doesn’t change the dynamic of the restroom ... the privacy is the same. ... I don’t think it affects anything.” Abby noted that a female transgender classmate used girls’ restrooms and locker rooms not to make others feel uncomfortable, but because that is who she is. Abby explained that “if anyone in a locker room is concerned [about privacy], it’s [her friend], she’s the one who wants to feel included and would never, ever want to make anyone feel uncomfortable.”

Some non-transgender *amici* report that, while they were initially reluctant to support policies permitting transgender students to be treated according to their gender identity, after becoming acquainted with transgender classmates, they

realized there was no reason why transgender students should not be respected for who they are. Alan Liang, a non-transgender high school senior in San Diego, reported that it took “a little time” for him and his classmates to adjust to a policy allowing transgender students to access restrooms and locker rooms based on gender identity, but they soon realized that “transgender students are just like anybody else. ... They don’t want to draw attention to themselves by going to the bathroom. ... [T]hey just want to be accepted for who they are.” Alan also observed that the change in policy fostered a supportive and inclusive environment at school. When describing one student who came out as transgender at school, Alan said that he went from being a quiet student to a “spritely, happy-go-lucky, talkative” guy who was “always energized,” and said that it was “awesome to see his transformation.” Alan’s first-hand experiences have taught him that when transgender students are accepted and supported, “they flourish, they succeed, they’re happy.”

CONCLUSION

Amici’s accounts demonstrate that school policies regarding restroom access have very real and lasting consequences for transgender students. When schools’ policies are unsupportive and discriminatory, transgender students struggle socially, medically, psychologically, and educationally. But when schools treat transgender students consistently with their gender identity in all respects — including allowing them to use sex-specific facilities such as restrooms and locker rooms

that match who they are — they thrive. Schools that foster an environment that supports and does not discriminate against transgender students not only enables them to succeed educationally and personally but also facilitates social, mental, and educational well-being for all students.

For these reasons, *amici* respectfully urge the Court to affirm the decision of the Fourth Circuit, in all respects.

Respectfully submitted,

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March 2, 2017

⁷ Law clerk Jeremy M. Green, who is not a member of the bar of any court and whose admission to the bar of the State of New York is pending, also assisted in the preparation of this brief.

APPENDIX

LIST OF *AMICI CURIAE*
TRANSGENDER STUDENTS AND ALLIES

Brandon Adams

Transgender male, age 17
Framingham, Massachusetts
(*Pictured above at page 10*)

* * *

Kate Brown

Transgender female, age 16
Alexandria, Virginia
(*Pictured below*)



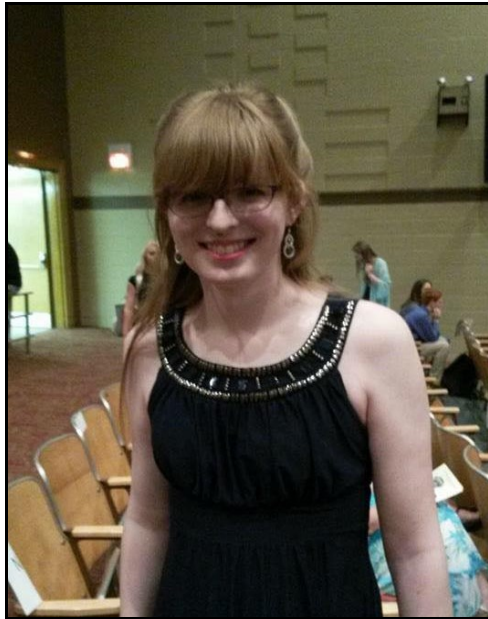
Lily Crane
Transgender female, age 15
Park City, Utah
(Pictured below)



Zay Crawford
Transgender female, age 14
Yellow Springs, Ohio
(Pictured below)



Maddie Dalton
Transgender female, age 18
Louisville, Kentucky
(Pictured below)



* * *

Abby Garske
Non-transgender female, age 17
Palatine, Illinois

* * *

Sydney “Siddy” Greenstein
Transgender male, age 13
Bethesda, Maryland
(Pictured above at page 21)

Kennedy Jones

Transgender male, age 18
Berryville, Arkansas
(Pictured above at page 25)

* * *

Dylan Kleiman

Transgender male, age 14
Alexandria, Virginia
(Pictured below)



* * *

Alan Liang

Non-transgender male, age 17
San Diego, California

Sarah Lore

Non-transgender female, age 16
Alexandria, Virginia

* * *

Emma McQueen

Transgender female, age 16
Clearfield, Kentucky
(Pictured above at page 30)

* * *

Marilyn Morrison

Transgender female, age 8
Grapevine, Texas
(Pictured above at page 35)

Kayden Ortiz
Transgender male, age 19
Fairfax, Virginia
(Pictured below)



* * *

Tori Partridge
Non-transgender female, age 17
Holly Pond, Alabama

Maxwell Platt
Transgender male, age 12
Arlington, Virginia
(Pictured below)



* * *

Evie Priestman
Transgender male, age 17
Arlington, Virginia
(Pictured above at page 13)

* * *

Cameron Rogers
Transgender male, age 17
Memphis, Tennessee
(Pictured above at page 33)

Joseph Rue

Non-transgender male, age 18
West Chester, Pennsylvania

* * *

Travis Sawyer

Transgender male, age 18
Tacoma, Washington & New York, New York
(Pictured above at page 27)

* * *

Nicole Talbot

Transgender female, age 15
Essex, Massachusetts
(Pictured above at page 16)

* * *

Leif Taranta

Transgender male, age 19
West Chester, Pennsylvania
(Pictured above at page 18)

Rowan Wooldridge
Transgender male, age 17
McLean, Virginia
(Pictured below with his parents)

