

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

In Re. 2025 Subpoena to Children's National
Hospital

Case No.: _____

DECLARATION OF PARENT H.H.

1. I am the parent of Child H.H., a minor who received medical care at Children's National Hospital ("CNH") between approximately December 2022 and June 2025. That care encompassed a range of medical care, including transgender-specific healthcare.
2. During the course of my child's care at CNH, my child and I, along with other members of our family, met with CNH physicians, nurses, and other staff. We also stayed in contact with CNH through phone calls and electronic messages.
3. I believe there are extensive medical records relating to my child's care held by CNH.
4. In those visits and communications, my child and I shared private information about my child's physical health, mental and emotional well-being, development and maturation, school life, relationships with peers and family members, and concerns about safety and stress. We understood that this information was gathered so CNH providers could assess my child's health, offer treatment recommendations, and track my child's progress over time.
5. My child and I met with physicians to discuss possible treatment options, the risks and benefits of those options, and our questions and concerns. These were careful, in-depth conversations about my child's health and well-being.

6. At various times, we spoke privately with CNH providers to ask questions and share concerns. We depended on those confidential discussions to determine how to best support our child.
7. Follow-up appointments included updates about my child's mental health, daily functioning, response to medications, and school and family life. These visits likely generated detailed notes in my child's medical record.
8. We consistently viewed the details we shared with CNH as sensitive medical information. It was our understanding that this information would be accessed only by healthcare professionals involved in my child's treatment and used solely to provide and coordinate care. We did not expect it to be released to anyone outside the healthcare system.
9. We chose CNH because of the providers' careful and thoughtful approach to transgender adolescent healthcare and the extensive processes and protocols in place. Our decision to seek care there was also based in part on our understanding that my child's medical information would be kept confidential, and CNH assured us that my child's records would remain confidential.
10. The possibility that my child's medical records could be handed over to the government is deeply distressing to me. These records contain highly personal information about my child's body, mental health, family situation, and private thoughts. I do not want government personnel to have access to or review these details. I am also concerned for my child's safety if the current administration were to obtain these records, given what I have seen it do to target and harm transgender individuals.

11. Releasing my child's medical records to the government would be extremely upsetting for them. My child already experiences a sense of vulnerability and understands the risks they face as a transgender person. The thought that government officials could scrutinize the most private aspects of their life would make my child feel exposed and targeted. It would also increase my anxiety about their safety and overall well-being.
12. I am concerned that if my child's records are disclosed in this case, it will affect how my child approaches healthcare in the future. My child has conveyed to me that the idea of government officials reading their medical chart gives them pause about speaking freely with doctors and therapists. If they do not feel they can be honest, they may delay or avoid seeking care they need. That makes me concerned as a parent about my child's ability to get the healthcare they need going forward.
13. I am additionally concerned that releasing my child's medical records would expose unique information about them that cannot be found elsewhere and has been essential in safeguarding their personal history.
14. As a parent, the idea of my child's confidential medical information being shared with the government would represent a profound violation of trust in the healthcare system. Like any parent, it would make me far more cautious about what we share in future appointments and influence where we choose to seek care.
15. The consequences of releasing my child's medical records would be far-reaching. Once these records are in government hands, my child would have no control over who reviews them, how they are used, or how long they are kept. This could result in lasting harm to their privacy and well-being.

16. I do not think that simply removing our names from my child's records would adequately safeguard our privacy. Throughout my child's care, we shared many details—like age, timing of appointments, family structure, school information, and other life events—that, when taken together, could reveal our family's identity.
17. Providing my child's medical records to the government would go against the expectations of privacy that guided our decision to seek care. We shared deeply personal information with CNH providers, believing it would remain protected within the healthcare system and be used only to care for my child.
18. Making my name public, which would inevitably reveal my child's identity, or releasing my child's name in a legal matter concerning their medical records, would inflict serious emotional distress on my child and expose us to possible threats of bullying, harassment, and discrimination.
19. If I am not allowed to use pseudonyms, I will probably need to withdraw from this case to safeguard my child's privacy and ensure their safety.
20. For all the reasons above, I strongly object to my child's medical records being shared with the government.
21. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Parent H.H.
Parent H.H.

Dated: 11/14/2025