

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

In Re. 2025 Subpoena to Children’s National
Hospital

Case No.: _____

DECLARATION OF YOUTH E.E.

1. My name is E.E. I sought care at Children’s National Hospital (“CNH”) because I required medical attention and trusted it would provide a confidential environment for discussing highly personal health matters. The disclosure of my records to the government would constitute a substantial violation of that privacy and would damage the trust I placed in the medical system and in CNH.
2. Between approximately 2016 and 2024, I received medical treatment at CNH, both in D.C. and at 2 Maryland facilities.
3. The knowledge that my records might be disclosed beyond the CNH healthcare system to government lawyers is deeply distressing. I believed when I was receiving treatment that the conversations and information I provided about my medical condition and treatment were confidential. I already have some mistrust of the medical system. And disclosing my confidential patient records, including information about medical care relating to me being transgender would invade my privacy. It would also make me even more hesitant in the future to seek and obtain care.
4. My healthcare providers at CNH routinely inquired about various aspects of my life, including my physical symptoms, emotional well-being, academic performance, and family dynamics. They asked about situations that caused me anxiety or made me feel

vulnerable. I provided truthful responses because I knew they needed accurate information to provide me appropriate medical care.

5. I am a transgender person. My CNH medical records likely contain information about intimate aspects of my physical development, and my experiences navigating the world as a transgender person. They also document private concerns and life experiences that I never intended for outsiders to access.
6. During follow-up visits, my providers evaluated not just my physical response to medication, but also my overall functioning—my emotional state, my performance at school, and my interpersonal relationships. These assessments were likely documented in detail in my medical records.
7. I have never voluntarily provided my medical records to a government entity nor did I ever anticipate that the Department of Justice would have access to my private medical information.
8. My CNH physicians prescribed medication as part of my treatment plan. This required ongoing monitoring through regular clinic visits, laboratory work, and physical examinations to assess my response to treatment and make any necessary modifications.
9. The possibility that my medical record might now be disclosed to government investigators or attorneys causes me significant distress. I do not want unfamiliar individuals examining detailed documentation about my physical development, my psychological state, my family relationships, and my personal experiences. I am particularly alarmed by the prospect of my medical information being given to the Department of Justice because of the hostility this administration has shown to transgender people.

10. Had I known at the beginning of my treatment that my medical records might subsequently be requested by the government, I would have been more guarded in my communications with providers. I might even have withheld certain information or discussed sensitive topics only in general terms.
11. During individual therapy sessions with mental and physical health providers, I discussed deeply personal matters about my identity, my struggles, and my experiences navigating adolescence. Much of what I shared I have disclosed only to either my immediate family or my medical providers.
12. When I disclosed personal information to my physicians and therapist, I understood it would be shared among healthcare professionals directly involved in my treatment. I did not believe that information shared in a medical setting would be transferred outside the healthcare context to a government agency.
13. I do not believe that redacting my name from the records would adequately protect my identity. My medical records likely contain identifying information such as my specific age, the dates and sequence of my appointments, the particular treatments I received, and details about my personal circumstances that, when considered together, would make me identifiable.
14. For the foregoing reasons, I believe that the disclosure of my medical records to the government would cause me serious harm. And that if I cannot proceed in this case under a pseudonym, I may face bullying, harassment, or discrimination.
15. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

E.E.

Youth E.E.

Dated: 11/13/2025