

Nos. 24-38, 24-43

IN THE
Supreme Court of the United States

BRADLEY LITTLE, GOVERNOR OF IDAHO, *et al.*,
Petitioners,

v.

LINDSAY HECOX, *et al.*,
Respondents.

WEST VIRGINIA, *et al.*,
Petitioners,

v.

B.P.J., BY HER NEXT FRIEND AND MOTHER,
HEATHER JACKSON,
Respondent.

**On Writs of Certiorari to the United States Courts
of Appeals for the Ninth and Fourth Circuits**

**BRIEF OF LAW AND HISTORY SCHOLARS
AS AMICI CURIAE
IN SUPPORT OF RESPONDENTS**

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TABLE OF CONTENTS

	Page
TABLE OF AUTHORITIES.....	iv
INTERESTS OF <i>AMICI CURIAE</i>	1
SUMMARY OF ARGUMENT	1
ARGUMENT.....	2
I. TRANSGENDER PEOPLE HAVE EXPERIENCED LONGSTANDING DE JURE DISCRIMINATION	3
A. Transgender People Have Been Subject to Criminal Prosecutions, Forced Institutionalization, and High-Risk Incarceration for Nearly Two Centuries.....	5
1. Transgender People Historically Have Been Prosecuted Under Cross Dressing Bans	5
2. Transgender People Historically Have Been Prosecuted for “Fraud” for Activities Considered Conventional for Cisgender People.....	7
3. Transgender People Historically Have Been Prosecuted for Public Decency and Vagrancy Crimes	8
4. Transgender People Historically Have Been Profiled as Sex Workers— and Disproportionately Targeted When They Engage in Sex Work	12

TABLE OF CONTENTS—Continued

	Page
5. Transgender People Historically Have Been Subjected to Involuntary Institutionalization and High-Risk Incarceration	15
6. Federal Agents Historically Used Incarceration to Compel Two-Spirit People to Abandon Their Cultural Practices	17
B. Transgender People Historically Have Been Excluded or Discriminated Against Across Many Legal and Societal Institutions	19
1. Transgender Immigrants Historically Have Been Denied Entry or Deported	19
2. Transgender People Historically Have Been Excluded from Public Service	20
3. Lawmakers Historically Have Sought to Deprive Transgender People of Civil Rights Protections in Public Accommodations and Employment	24
4. Transgender Victims Historically Have Been Excluded from Legal Deterrents and Protections Against Violence.....	26

TABLE OF CONTENTS—Continued

	Page
5. Transgender People Historically Have Been Excluded from Recognition and Rights in Familial Institutions.....	28
CONCLUSION	31
APPENDIX	

TABLE OF AUTHORITIES

CASES	Page(s)
<i>Anonymous v. Anonymous</i> , 325 N.Y.S.2d 499 (N.Y. Sup. Ct. 1971)	29
<i>Ashlie v. Chester-Upland Sch. Dist.</i> , 1979 U.S. Dist. LEXIS 12516 (E.D. Pa. May 9, 1979).....	21
<i>Blackwell v. Dep't of Treasury</i> , 656 F. Supp. 713 (D.D.C. 1986), <i>vacated</i> <i>in part on other grounds</i> , 830 F.2d 1183 (D.C. Cir. 1987)	22, 25
<i>Bostock v. Clayton Cnty., Georgia</i> , 590 U.S. 644 (2020).....	21
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TABLE OF AUTHORITIES—Continued

	Page(s)
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	Page(s)
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<i>People v. Jordan</i> , 24 Cal. App. 2d 39 (1937)	11
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U.S. Const. amend. XIV	2

TABLE OF AUTHORITIES—Continued

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TABLE OF AUTHORITIES—Continued

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TABLE OF AUTHORITIES—Continued

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INTERESTS OF *AMICI CURIAE*¹

Amici are well-recognized legal scholars and historians with expertise in the history of gender, sexuality, and LGBTQ rights. Though *Amici* file this brief in individual capacities, their qualifications and affiliations appear in the Appendix.

Amici here recount for the Court the longstanding history of *de jure* discrimination against transgender people in the United States. As this Court has previously acknowledged, this historical perspective is critical to the consideration of whether laws targeting transgender people warrant heightened scrutiny under the 14th Amendment’s Equal Protection Clause.

SUMMARY OF ARGUMENT

In assessing whether a classification is “suspect” or “quasi-suspect,” this Court considers, among other things, whether the group has “suffered a history of *de jure* discrimination.” *United States v. Skrametti*, 605 U.S. 495, 554 (2025) (Barrett, J., joined by Thomas, J., concurring). As Justice Barrett observed in her *Skrametti* concurrence, the parties there “did not thoroughly discuss whether transgender individuals have suffered a history of *de jure* discrimination as a class.” *Id.* at 556–57. This brief answers that question, gathering historical evidence and scholarship to demonstrate the longstanding, severe, and pervasive history of *de jure* discrimination against transgender people. This “demonstrated history,” *ibid.*, of a “longstanding

¹ Pursuant to U.S. Supreme Court Rule 37, counsel for *Amici Curiae* state that no counsel for a party authored this brief in whole or in part, and no person—other than the *Amici* or their counsel—made a monetary contribution intended to fund the preparation or submission of this brief.

pattern of discrimination *in the law*,” *id.* at 554, shows that transgender status meets the constitutional test as a quasi-suspect classification under the Equal Protection Clause, and demonstrates why the categorical transgender sports bans challenged here should receive meaningful judicial scrutiny.

ARGUMENT

Nearly 90 years ago, this Court observed that “prejudice against discrete and insular minorities may be a special condition, which tends seriously to curtail the operation of those political processes ordinarily to be relied upon to protect minorities, and which may call for a correspondingly more searching judicial inquiry” of laws targeting such minority populations. *United States v. Carolene Prods. Co.*, 304 U.S. 144, 152 n.4 (1938). Since then, courts asked to determine whether a classification is “quasi-suspect” consider three questions. Has the group historically been “subjected to discrimination”? Is the group defined by “obvious, immutable, or distinguishing characteristics”? And is it “a minority or politically powerless”? *Lyng v. Castillo*, 477 U.S. 635, 638 (1986); *Skrmetti*, 605 U.S. 495, 549–50 (conurrence). This brief addresses the first of those questions: Whether transgender people have been historically subjected to discrimination.

This Court’s analysis of historical discrimination has included discrimination enshrined in federal law, *see Frontiero v. Richardson*, 411 U.S. 677, 685 (1973) (plurality opinion); discrimination found in “official state sources,” *Loving v. Virginia*, 388 U.S. 1, 10 (1967); discriminatory local laws and policies, *see Frontiero*, 411 U.S. at 685 (noting women could not hold office, serve on juries, bring suit in their own names, hold property, or serve as legal guardians for their children); and ingrained patterns and practices of

discrimination, by government and private actors, *see id.* at 685–86 (taking into account the “pervasive” discrimination against women in “educational institutions, in the job market and, perhaps most conspicuously, in the political arena”).

In the view of *Amici*, government action that creates or perpetuates social inequality by treating members of unpopular or stigmatized groups differently from others under the law necessarily requires consideration of both government and societal sources of discrimination. But even looking at *de jure* discrimination alone, our nation’s history is rife with examples of official discrimination against transgender people.

I. TRANSGENDER PEOPLE HAVE EXPERIENCED LONGSTANDING *DE JURE* DISCRIMINATION.

The recorded existence of transgender people well predates the founding of the United States. They “appear consistently in fiction, religious texts, church and court records, and even in texts authored by trans people themselves from antiquity onward.” Greta LaFleur, Masha Raskolnikov, & Anna Klosowska, *The Benefits of Being Trans Historical*, in *Trans Historical* 4 (2021); *see, e.g.*, Roland Betancourt, *Where Are All the Trans Women in Byzantium?*, in *Trans Historical* 297, 306–09 (eds. LaFleur, Raskolnikov, & Klosowska 2021) (discussing Roman emperor Elagabalus (203–222 CE) described as a transgender woman in ancient texts).

The term “transgender” thus is not a new category; it is “a modern word to describe an ever-present group of people.” Eli Erlick, *Before Gender: Lost Stories from Trans History, 1850–1950*, at 15 (2025) (hereafter Erlick). The term “transgender” broadly means expression of a gender identity that does not align with the

expectations for a person’s sex assigned at birth. *See* Susan Stryker, *Transgender History* 1 (2d Ed. 2017) (describing transgender people as those who “move away from the gender they were assigned at birth, people who cross over . . . the boundaries constructed by their culture to define and contain gender”).

Throughout history, transgender people have been labeled in many ways— “transsexual,” “transvestite,” “effeminate,” “mannish,” “male or female impersonator,” “deviant,” and “sexual psychopath,” to name a few. *See id.* at 14, 24–25, 36–40; *see also infra* at 10, 15–19. Today, the term “transgender” encompasses experiences that might today also be named nonbinary, gender nonconforming, or Two-Spirit.² Like the words used to describe racial and ethnic groups over time, the words used to describe transgender people similarly have evolved over the course of history, but the nature of the group is unchanged.

Transgender people have contributed to the United States’ rich history since its founding. Going back to least the early 1800s, however, U.S. lawmakers and other state and local actors have consistently implemented and enforced policies that criminalized and excluded transgender people from full and equal participation in society.

² The term “Two-Spirit” was coined in 1990 as a portmanteau of two Anishinaabemowin (Ojibwe) words to better describe and affirm Indigenous self-identification of gender and sexuality variation. Kylan Mattias de Vries and Jodi O’Brien, *Encyclopedia of Gender and Society* 64 (2009). Two-Spirit is a cultural pan-Indigenous term, reflecting that many First Nations had traditions of accepting gender nonconformity. *See id.* at 63–64.

A. Transgender People Have Been Subject to Criminal Prosecutions, Forced Institutionalization, and High-Risk Incarceration for Nearly Two Centuries.

Transgender people have been prosecuted for public displays of gender nonconformity through cross-dressing and fraud charges, and have also been the disproportionate targets of policing tactics, leading to frequent charges under public decency, vagrancy, and solicitation laws. Transgender people also have been subjected to court-ordered institutionalization in asylums and high-risk detention facility policies, as well as incarceration that coerced Two-Spirit people to abandon their cultural traditions.

1. Transgender People Historically Have Been Prosecuted Under Cross-Dressing Bans.

Beginning in St. Louis in 1843, cross-dressing laws proliferated across every region of the country, from large cities to small towns. Kate Redburn, *Before Equal Protection: The Fall of Cross-Dressing Bans and the Transgender Legal Movement, 1963–86*, 40 L. & Hist. Rev. 679, 681, 687, 718–723 (2022) (hereafter Redburn) (listing cross-dressing bans across the United States). Toledo, Ohio, for example, made it a crime for any “perverted person” to “appear in a . . . dress not belonging to his or her sex.” I. Bennett Capers, *Cross Dressing and the Criminal*, 20 Yale J.L. & Human. 1, 8 (2008) (hereafter Capers). See also Clare Sears, Arresting Dress 3–4 (2015); Marc Stein, *Law and Politics: “Crooked and Perverse” Narratives of LGBT Progress*, in *The Routledge History of Queer America* 316 (2018) (hereafter Stein) (noting 25 cities that had enacted cross-dressing bans by the end of the 19th century). Many laws expressly prohibited “wearing a

dress not belonging to his or her sex,” while others used vague restrictions to prosecute people for wearing gender non-conforming clothes, such as New York’s law prohibiting “disguises” and California’s law prohibiting “masquerading.” Capers 9; Redburn 687.

Enforcement of these laws often included physical examinations of transgender people for use as evidence against them in court. In 1866, Black transgender woman Frances Thompson gained notoriety for testifying before a Congressional committee about being beaten and raped by white men. Ten years later, Thompson was arrested for cross-dressing and forcibly subjected to physical examinations by four doctors. The doctors testified at Thompson’s cross-dressing trial, and Thompson was convicted, fined, and sentenced to a chain gang. See “Francis Thompson The Vile and Villainous Negro, Who, for Twenty-Seven Years, Has Passed Himself Off as a Woman—His Arrest,” *The Daily Gazette* (Memphis, Tennessee), July 20, 1876, <https://ssl.digitaltransgenderarchive.net/files/zw12z556v> (visited Nov. 8, 2025).

Physical examinations of transgender people arrested for cross-dressing continued well into the 20th century. In 1973, two transgender women were arrested in Chicago for violating a cross-dressing ordinance. Redburn 693. Officers forced the women to strip to their underwear for photographs so the officers could “prove” they were cross-dressing. *Id.*

Cross-dressing bans are not merely historical relics; enforcement of such laws continued at least through the 1980s in some jurisdictions. See *People v. Archibald*, 296 N.Y.S.2d 834, 836 (App. Div. 1968) (upholding cross-dressing conviction for concealing the defendant’s “true gender”); *Fletcher v. State*, 472 So. 2d 537 (Fla. Dist. Ct. App. 1985) (upholding sentencing

enhancement for transgender person wearing women's clothing). *But see City of Columbus v. Rogers*, 324 N.E.2d 563 (Ohio 1975) (overturning cross-dressing conviction as unconstitutionally void for vagueness).

2. Transgender People Historically Have Been Prosecuted for “Fraud” for Activities Considered Conventional for Cisgender People.

State and federal governments have historically prosecuted transgender people under fraud statutes for commonplace activities such as getting married, collecting spousal benefits, and being employed.

In 1945, for example, a doctor outed Lucy Hicks Anderson—a well-regarded philanthropist in the community—as a transgender woman, resulting in California seeking perjury charges against her for signing her marriage certificate. C. Riley Snorton, *Black on Both Sides: A Racial History of Trans Identity* 147, 149–50 (2017) (hereafter Snorton). The federal government brought related charges against her husband to invalidate the dependent-spouse military benefits she received. *Ibid.*; *see also* Paisley Currah, *Sex Is as Sex Does: Governing Transgender Identity* 6 (2022) (hereafter Currah) (describing the case of Jane Jones, charged with “marriage upon false personation” when a police officer discovered an incongruity between her driver's license and marriage certificate).

The federal government likewise prosecuted transgender woman, John Murphy Goodshot, in 1958 for receiving dependent-spouse military benefits. Joanne Meyerowitz, *How Sex Changed: A History of Transsexuality in the United States* 87 (2002) (hereafter Meyerowitz). The government invalidated

Goodshot's benefits, and the court compelled psychiatric treatment designed to "bring out" Goodshot's "masculine qualities." *Id.*

In 1909, when William Winters's transgender identity was discovered after an arrest in St. Louis, the boilermakers' union pressed embezzling charges, seeking the return of \$249 wages for Winters's secretarial work on the theory that the union excluded women. Erlick 210–12. Winters avoided continued prosecution by agreeing to detransition, return the wages, and pay a \$100 fine for "idling." *Id.*

In the civil realm, transgender people have been denied name change requests under similar fraud theories. In one case, for example, the court denied a transgender person's application for a name change because the applicant had not proffered sufficient proof of a "sex change," leading the court to conclude that "the change of name from a 'male' name to a 'female' name would be fraught with danger of deception and confusion" *In the Matter of Anonymous for Leave to Change His Name*, 587 N.Y.S.2d 548, 549 (Civ. Ct. Queens Co. 1992).

3. Transgender People Historically Have Been Prosecuted for Public Decency and Vagrancy Crimes.

Transgender people were long prosecuted for public decency and vagrancy crimes—particularly in the post-Prohibition era. See Marc Stein, *Historical Landmarks and Landscapes of LGBTQ Law*, in *LGBTQ America* 19-6 (National Park Service 2016) (hereafter Stein, *Historical Landmarks*) (listing examples of cities and states employing "ambiguously

defined” public decency laws,³ which were “used more frequently” than other morals laws because it gave “broad discretion to arrest individuals for various reasons,” including “people who violated gender norms”), <https://npshistory.com/publications/nhl/theme-studies/lgbtq-america.pdf> (visited Nov. 12, 2025); *see also* Stein 316 (noting that, from the 1850s–1960s, annual arrests of LGBTQ people for crimes like disorderly conduct, indecency, lewdness, solicitation, and vagrancy were quite common—likely in the “thousands”); Jesse Bayker, *Before Transsexuality: Transgender Lives and Practices in Nineteenth-Century America* 71–72 (2019) (unpublished Ph.D. dissertation, Rutgers University), available at <https://rucore.libraries.rutgers.edu/rutgers-lib/60594/> (accessed Nov. 12, 2025) (hereafter Bayker) (discussing how enforcement of New York’s disguise / vagrancy law targeted gender nonconformity for nearly a century). “Vice officers would raid taverns and clubs where gay men, lesbians, and gender nonconformists gathered, using every option they had available to penalize queer life.” Marie-Amélie George, *Family Matters: Queer Households and the Half-Century Struggle for Legal Recognition* 37 (2024) (hereafter George). “Each year, [law enforcement] extorted, raided, and closed hundreds or thousands of businesses frequented by LGBT people.” Stein 316.

Transgender people not only were subjected to heightened state surveillance, but were prosecuted for crimes like vagrancy, indecency, and disorderly conduct at particularly high rates. *See* Stein, *Historical Landmarks* at 19-6 (explaining that “people who

³ Early adopters of such decency laws included San Francisco (1866), Portland, Oregon (1868), Indianapolis (1869), Massachusetts (1860), California (1872), Washington (1875), Illinois (1877), and New York (1890). Stein, *Historical Landmarks* 19-6.

violated gender norms were distinctly vulnerable” to these arrests). For example, in 1968, a transgender woman was convicted under New York’s vagrancy statute, which made criminal “a vagrant . . . who . . . [has] his face painted, discolored, covered, or concealed, or being otherwise disguised, in a manner calculated to prevent his being identified.” *People v. Archibald*, 296 N.Y.S.2d 834, 835–36 (App. Term 1968).

Vice squad policing tactics impacted transgender people and gay men alike. In the early 1900s, gay men were commonly conceptualized as a “*third sex*—some mix of feminine psyche and masculine body . . .” Anna Lvovsky, *Vice Patrol* 29 (2021) (hereafter Lvovsky) (emphasis in original). Vice officials “commonly conflated homosexuality and gender inversion as twin sides of the same pathology . . .” *Ibid.* Modern understandings of gender identity and sexuality as distinct concepts were just forming, but law enforcement officials intertwined the two under the umbrellas of “pervert,” “degenerate,” “pederast,” “sodomite,” or even “fairy,” “fag,” and “female impersonator.” See Margot Canaday, *The Straight State* 11 (2009) (hereafter Canaday); Lvovsky 21. “[P]ublic understandings of sexual deviance depended as much on gender presentation as on sexual practice[.]” Lvovsky 44; see also Scott De Orio, *Bad Queers: LGBTQ People and the Carceral State in Modern America*, 47 *Law & Soc. Inquiry* 691, 696 (2022) (hereafter De Orio) (“[I]f federal officials did have an overarching paradigm for identifying ‘deviance’ [in early 20th century], it was looking for signs of gender nonconformity, as opposed to evidence of same-sex desire.”).

For vice squads, the presence of transgender people flagged LGBTQ establishments for investigation and prosecution. “In part, cataloging the patrons’ effeminate

conduct allowed [liquor] agents to prove they had accurately identified a gay bar to begin with.” Lvovsky 42.⁴ Transgender people were likewise targets outside of taverns; “officers searching for potential arrests frequently found it easiest to focus on gender-nonconforming individuals.” Lvovsky 107. “As one [Los Angeles Police Department] officer recalled, ‘normal’ homosexuals, indistinguishable from other men, rarely caught the vice squad’s eye: it was ‘the ones who dress or act aggressively or outrageously that attract[ed] our attention.’” *Ibid.*

Transgender people—especially non-white transgender people—were arrested more frequently and punished more severely than their cisgender counterparts. *Ibid.*; *see also id.* at 21 (noting that Black transgender people drew the “brunt” of policing tactics); George 60 (policing disproportionately impacted transgender people of color). Working class transgender people of color similarly received harsher treatment than white, gay men at the hands of police or courts. Lvovsky 108 (explaining that poor, Black, transgender people “rarely” received lenient treatment by police); *see also* Redburn 692–93 (detailing abuses of transgender women in pretrial detention). For example, in one 1962 North Carolina case, a transgender woman received approximately four times the sentence for consensual

⁴ *See also Vallerga v. Dep’t of Alcoholic Beverage Control*, 53 Cal. 2d 313, 315, 320 (1959) (recognizing that evidence of a “butch” woman in “mannish” attire and a “person dressed and made up as a man” but “was in fact a woman,” could support charges that a bar was “a resort for sexual perverts, to wit: Homosexuals”); *People v. Jordan*, 24 Cal. App. 2d 39, 44, 49–50 (1937) (noting trial evidence of two men dressed as women offered to prove conspiracy to commit lewd and lascivious acts).

sodomy as her male partner (20-to-30-years vs. 5-to-7 years). Lvovsky 196.

Studies also demonstrate the disproportionate prosecution of transgender people through public decency offenses. A 1973 study of California’s enforcement of its law against “lewd or dissolute conduct” in Los Angeles highlights this disparity; 90% of 50 bar arrests over a four-month period occurred in gay bars, and Black and Latine people were arrested for “gay cruising and being trans in public” under California’s prohibition in greater proportions than the average population. De Orio 700. Similarly, a 2005 Amnesty International (AI) study found that “law enforcement officers profile LGBT individuals, *in particular gender variant individuals* and LGBT individuals of color, as criminal in a number of different contexts, and selectively enforce laws relating to ‘morals regulations[.]’” AI, Stonewalled: Police Abuse and Misconduct Against Lesbian, Gay, Bisexual, and Transgender People in the U.S. 4 (Sep. 21, 2005) (hereafter AI Study) (emphasis added), <https://www.amnesty.org/en/documents/AMR51/122/2005/en/> (visited Nov. 10, 2025).

4. Transgender People Historically Have Been Profiled as Sex Workers—and Disproportionately Targeted When They Engage in Sex Work.

Police have a long tradition of profiling transgender women—especially transgender women of color—on suspicion of prostitution. For example, in the late 1800s, William Dorsey Swann was convicted of “keeping a disorderly house” for throwing a party where Dorsey Swann and other guests assigned male at birth wore women’s clothing. *Kept a “Hell of Iniquity”: Judge Kimball Sends Dorsey Swann Down for Ten Months*, The Evening Star, Jan. 13, 1896, at 2, <https://www.loc>.

gov/resource/sn83045462/1896-01-13/ed-1/?sp=2&st=pdf&r=-0.257,-0.076,1.514,1.514,0 (visited Nov. 12, 2025).

The frequency of such police encounters has led to the transgender community naming the phenomenon “walking while trans.” Shawn E. Fields, *The Elusiveness of Self-Defense for the Black Transgender Community*, 21 Nev. L.J. 975, 983 (2022) (hereafter Fields). As a transgender Latine woman in Jackson Heights, New York, recalls, “I was just buying tacos. They grabbed me and handcuffed me. They found condoms in my bra and said I was doing sex work.” Make the Road New York, *Transgressive Policing: Police Abuse of LGBTQ Communities of Color in Jackson Heights* 4 (2012), https://maketheroadny.org/wp-content/uploads/2018/02/MRNY_Transgressive_Policing_Full_Report_10.23.12B.pdf (visited Nov. 12, 2025). Amnesty International’s 2005 study contains an entire section devoted to the profiling of transgender women as sex workers, finding reports of police harassment in major cities from coast-to-coast. AI Study 21. Amnesty International’s interviews with law enforcement confirmed law enforcement’s pervasive belief that “high percentages of transgender women are sex workers.” Lenore F. Carpenter & R. Barrett Marshall, *Walking While Trans: Profiling of Transgender Women by Law Enforcement and the Problem of Proof*, 24 Wm. & Mary J. Women & L. 15 (2017) (hereafter Carpenter & Marshall) (citing AI Study 22).

Transgender women who *do* engage in sex work, for their part, are disparately targeted by police. *See id.*; *see also* Madeline Stenersen et al., *Police Harassment and Violence Against Transgender & Gender Diverse Sex Workers in the United States*, J. Homosex. 828–40 (2024) (finding transgender women were at a higher likelihood of interacting with the police while doing

sex work than other groups). As one Detroit police officer confessed, it was routine procedure for transgender people suspected of doing sex work to be booked pretextually on suspicion of larceny, “a practice officially rationalized by sex workers’ alleged habit of ‘rolling’ their customers.” Lvovsky 108.

Other studies corroborate these findings, including a 2011 study where 38 percent of Black transgender respondents reported police harassment, compared to an overall rate of 22 percent for the larger transgender community. Carpenter & Marshall at 13 n.39 (citing Nat’l Ctr. for Transgender Equality & Nat’l Gay & Lesbian Task Force, *Injustice at Every Turn: A Report of the National Transgender Discrimination Survey* 168 (2011)); *see also* Carpenter & Marshall at 15 nn.47–49 (citing Alliance for a Safe & Diverse D.C., *Move Along: Policing Sex Work in Washington, D.C.*, and Frank H. Galvan and Moshen Bazargan, *Interactions of Latina Transgender Women with Law Enforcement* (April 2012) <https://williamsinstitute.law.ucla.edu/publications/latina-trans-women-law-enforcement/> (visited Nov. 12, 2025)). Law enforcement’s historical (and ongoing) profiling of transgender women is *de jure* discrimination. *Cf. Yick Wo v. Hopkins*, 118 U.S. 356, 373–74 (1886) (finding equal protection violation where public officials administered a facially neutral law “with an evil eye and unequal hand, so as practically to make unjust and illegal discriminations between persons in similar circumstances”).

5. Transgender People Historically Have Been Subjected to Involuntary Institutionalization and High-Risk Incarceration.

Transgender people have also been subjected to court-ordered institutionalization in asylums and detention facility policies that jeopardized their safety and well-being.

From the 19th century to well into the 20th century, courts ordered transgender individuals to involuntary detention in asylums. A transgender woman named Estelle Culton was confined to an asylum in 1897. Bayker 217. In 1955, Perfecto Martinez was deemed a “sexual psychopath” and indefinitely committed to a psychiatric institution until *cured* for wearing women’s clothing and engaging in homosexual acts. *See In re Martinez*, 130 Cal. App. 2d 239, 240–41 (1955); *see also* Jules Gill-Peterson, *Histories of the Transgender Child* 31 (2018) (recognizing that faulty diagnoses subjected Black transgender children to “potentially indefinite detention in psychiatric facilities”); Meyerowitz 137 (noting that “arrests sometimes led to confinement in mental institutions”); De Orio 699 (noting that “sexual psychopath” laws passed in 26 states and Washington, D.C., between 1937 and 1967, permitted indefinite civil commitment of transgender people).

The case of transgender man Joseph Lobdell provides an early example of court-ordered institutionalization. In the 1860s, Lobdell was forcibly institutionalized in an asylum at the behest of his brother. Jen Manion, *Female Husbands* 222 (2020). Lobdell’s brother and other witnesses testified that Lobdell was “insane,” but “the key thread that runs through the testimony is a claim that [Lobdell] rejected the gender restrictions of womanhood.” *Id.* at 224. Per one witness, “I know that

[Lobdell] sometimes dresses in men's clothes . . . on that subject . . . I think [Lobdell] of unsound mind." *Id.* at 223.

Institutions tolerated doctors' experimentation on forcibly confined transgender patients. For instance, in 1940, a doctor detailed his use of Metrazol, a chemical stimulant that induces grand mal seizures, to "treat" transgender patients. One "man-woman patient," who had been imprisoned for "perversion," experienced 10 such drug-induced seizures as part of the treatment. Jonathan Katz, *Gay American History: Lesbians and Gay Men in the U.S.A.* 165–66 (1976) (case 3). In 1944, another doctor recorded electroshock experiments on an "effeminate" Black "female impersonator" that took place between 1941 and 1943. *Id.* at 170–73. The doctor wrote that the patient was discharged after the original electroshock therapy in 1941 cured "his psychosis and transvestism," only for the patient to be readmitted for more 13 more rounds of electroshocks in December 1942. *Id.* at 173.

State-run detention facilities have also historically maintained housing policies that consciously placed transgender people's safety at risk. *See, e.g.,* Fred V. Williams, *Man-Woman Serves Three Years of Prison Term Among Male Convicts*, *The Day Book*, Aug. 25, 1916 (Chicago, IL), <https://www.loc.gov/resource/sn83045487/1916-08-25/ed-1/?sp=15&st=image> (visited Nov. 12, 2025) (noting abuses suffered by transgender woman Artie Baker while housed in a men's prison). A 2012 study reported that transgender incarcerated people suffer sexual violence at "over eight times the rate of the general prison population." D. Dangaran, *Abolition as Lodestar: Rethinking Prison Reform from a Trans Perspective*, 44 *Harv. J. L. & Gender* 161, 189 (2021) (hereafter Dangaran) (citing Allen J. Beck, U.S.

Dep't of Just., Sexual Victimization in Prisons and Jails Reported by Inmates, 2011–12: Supplemental Tables: Prevalence of Sexual Victimization Among Transgender Adult Inmates 2 (2014)). Despite being aware of the increased risks of physical harm to transgender women housed in men's facilities, many detention facilities have long maintained that practice. *See, e.g., Farmer v. Brennan*, 511 U.S. 825 (1994) (prison officials may be liable under Eighth Amendment for deliberate indifference to sexual assault of transgender woman in men's prison); Dangaran 192–93 (citing study of California prison system, circa 1980, where prison guards knowingly placed effeminate men in housing that increased the risk of sexual violence).

6. Federal Agents Historically Used Incarceration to Compel Two-Spirit People to Abandon Their Cultural Practices.

Many First Nations had cultural traditions in which Two-Spirit people were “well-respected and integrated into tribal life.” Andrew Gilden, *Preserving the Seeds of Gender Fluidity: Tribal Courts and the Berdache Tradition*, 13 Mich. J. Gender & L. 237, 241 (2007) (hereafter Gilden). Acting pursuant to their federal authority over Native American land and peoples, however, federal agents singled out and punished Two-Spirit people for their gender nonconformity.⁵

⁵ For example, the General Allotment Act of 1887 (also known as the Dawes Act) provided that Native Americans under the conditions of the Act would “be subject to the laws, both civil and criminal, of the State or Territory in which they may reside,” General Allotment Act of 1887, ch. 119, § 6, 24 Stat. 388 (1887). The Act encouraged abandoning Native American cultural traditions, extending citizenship to Native Americans who “ha[ve] voluntarily taken up, within said limits, [their] residence

In the late 1800s, for example, federal agents were deployed to reservations to “compel [Two-Spirit] people, under threat of punishment, to wear men’s clothing.” S.C. Simms, *Anthropologic Miscellanea*, *American Anthropologist* 581 (1903). In the 1870s, agents targeted *badés*, respected Crow nation members “that today might fall under the pan-Indigenous category Two-Spirit.” Jules Gill-Peterson, *A Short History of Trans Misogyny* 36 (2024) (hereafter Gill-Peterson). “The agent incarcerated the *badés*,” “cut off their hair, made them wear men’s clothing,” and “forced them to do manual labor.” Walter L. Williams, *The Spirit and the Flesh* 179 (1986) (quoting Crow tribal historian Joe Medicine Crow); Gill-Peterson 36–37. The coercive measures had their intended effect; “by 1934, [Two-Spirit people] no longer enjoyed the cultural endorsement and respect they traditionally had.” Gilden 255 (citing Walter L. Williams, *The Spirit and the Flesh* 183–87 (2d ed. 1992)).

separate and apart from any tribe of Indians” and “ha[ve] adopted the habits of civilized life” *Id.* Federal agents in the Office of Indian Affairs (later, the Bureau of Indian Affairs) were thus empowered to evaluate the gender conformity, among other things, of Native Americans being granted citizenship under the Act. Likewise, the Indian Civilization Fund Act of 1819 provided funding to societies—mostly religious organizations and institutions, U.S. Dep’t of the Interior, *Federal Indian Boarding School Initiative Investigative Report* 27 (2022) (visited Nov. 13, 2025), https://www.bia.gov/sites/default/files/dup/inline-files/bsi_investigative_report_may_2022_508.pdf—to establish and run residential boarding schools for Native American children with the express purpose of “introducing among them the habits and arts of civilization.” Act of March 3, 1819, ch. 85, 3 Stat. 516 (1819).

**B. Transgender People Historically Have
Been Excluded or Discriminated
Against Across Many Legal and Societal
Institutions.**

Transgender people have also experienced *de jure* discrimination in the civil context that excluded them from legal protections afforded to cisgender people, such as immigration, public service, civil rights protections, and legal safeguards of the family unit and against violence.

**1. Transgender Immigrants Historically
Have Been Denied Entry or Deported.**

Beginning in the late 1800s and until the 1990s, the U.S. government historically denied entry to, or deported, transgender migrants, using a plethora of derogatory statutory labels: *e.g.*, “degenerates,”⁶ “constitutional psychopathic inferiors,” “sexual deviates,” and “psychopathic personalities.” See Canaday 21–22; Stein 317 (noting that “Congress repealed the ban on immigrants with ‘psychopathic personalities’ and ‘sexual deviations’” in 1990).

Immigration officials were instructed to look for signs that people were transgender. The 1918 Manual for Mental Examination of Aliens stated that, if the “characteristics of one sex approach[ed] those of the other,” it was a potential sign of “degeneration.” U.S. Public Health Service, Manual for Mental Examination of Aliens 21 (1918). For example, in the 1910s, Alejandra Velas arrived at Ellis Island wearing men’s clothing, only to be deported after a medical examination.

⁶ In the first half of the 20th century, immigration officials lumped together transgender and gay people under the label “degenerates.” See Canaday 21–22, 253.

Eithne Luibhéid, *Entry Denied: Controlling Sexuality at the Border* 11–12 (1998). In 1912, Hungarian Verona Sogan, called “Mary” by her family, arrived in New York, and upon examination, was determined to have “malformed” male genitalia. *Canaday* 36. Officials interrogated Sogan and her family about her life as a woman and subsequently denied entry, concluding that Sogan “likely [would] become a public charge” because of her “effeminate” appearance and alleged propensity to become a “moral pervert.” *Id.* at 37.

The 1917 Immigration Act excluded “mentally defective” immigrants—a “broad term” that included transgender migrants. Lauren M. DesRosiers, *Out of Bounds, Gender Outlaws, Immigration & the Limits of Assimilation*, 24 *Geo J. Gender & L.* 117, 126–27 (2022) (hereafter DesRosiers); *see also* Stein 317. The 1952 Immigration and Nationality Act barred people “perceived to transgress gender . . . boundaries by adding language to exclude noncitizens with ‘psychopathic personality.’” DesRosiers 126 (citing Immigration and Nationality Act, Pub. L. No. 82-414, § 212, 66 Stat. 182 (1952)). Congress put an even sharper point on the issue in 1965, updating the legislation to add “sexual deviation” to its list of justifications to exclude transgender immigrants. DesRosiers 126 (citing Immigration and Nationality Act of 1965, Pub. L. 89-236, § 15, 79 Stat. 991 (1965)). As the Senate Report explains, the amendment “specifically provide[s] for the exclusion of homosexuals and sex perverts.” 1965 U.S.C.C.A.N. 3328, 3337.

2. Transgender People Historically Have Been Excluded from Public Service.

For decades, transgender individuals in the United States have faced systemic exclusion by government

employers, from local school districts to federal agencies and the military.

Cases from the past 50-plus years document the exclusion of transgender people from public employment. For example, in the early 1970s, a tenured public school music teacher was fired following her gender transition. *In re Grossman*, 127 N.J. Super. 13 (App. Div. 1974). The court upheld her termination, speculating that her presence might cause “psychological harm” to students. *Id.* at 32. In another case, the court upheld the termination of a transgender schoolteacher, likening the teacher to someone trying to change “into a donkey.” *Ashlie v. Chester-Upland Sch. Dist.*, 1979 U.S. Dist. LEXIS 12516, at *14–15 (E.D. Pa. May 9, 1979). Rejecting the teacher’s constitutional claim, the court cited “the serious adverse effect that the school board feared such conduct would have on the students.” *Id.* at *17; *see also Glenn v. Brumby*, 633 F.3d 1312, 1314 (11th Cir. 2011) (employee terminated by state employer after coming out as transgender).⁷

The federal government also banned transgender individuals from federal employment for years. In 1953, President Eisenhower issued Executive Order

⁷ Title VII applies to government employers in certain instances. *See* 42 U.S.C. §§ 2000e(a), (b), 2000e-16(a). But for many years, transgender people could not avail themselves of its protection, because courts routinely construed Title VII to exclude such discrimination. *See, e.g., Ulane v. Eastern Airlines, Inc.*, 742 F.2d 1081, 1084 (7th Cir. 1984), *cert. denied*, 471 U.S. 1017 (1985) (“Title VII does not protect transsexuals”); *Etsitty v. Utah Transit Auth.*, 502 F.3d 1215, 1221–22 (10th Cir. 2007) (same). That uncertainty lasted until this Court’s decision in *Bostock v. Clayton Cnty., Georgia*, 590 U.S. 644, 660 (2020), which confirmed that “it is impossible to discriminate against a person for being homosexual or transgender without discriminating against that individual based on sex.”

10450, authorizing the denial or termination of federal employment on the grounds of “sexual perversion.” Exec. Order No. 10450, 18 Fed. Reg. 2489 (1953). The termination affected thousands of LGBTQ employees. Stein 317 (noting more than 5,000 jobs lost in the 1950s and 1960s). At the time, the American Psychiatric Association’s 1952 Diagnostic and Statistical Manual of Mental Disorders (DSM-I) classified “transvestism” and “homosexuality” as “sexual deviations,” grouping them with pedophilia, fetishism, and sexual sadism, and defining them as manifestations of a “psychopathic personality with pathologic sexuality.” DSM-I at 38–39.⁸ The federal government maintained this prohibition for decades. *See, e.g., Doe v. U.S. Postal Serv.*, No. 84-3296, 1985 WL 9446 (D.D.C. June 12, 1985) (job offer withdrawn after applicant announced intent to transition); *Blackwell v. Dep’t of Treasury*, 656 F. Supp. 713 (D.D.C. 1986), *vacated in part on other grounds*, 830 F.2d 1183 (D.C. Cir. 1987) (job vacancy withdrawn to avoid hiring transgender employee).

⁸ “Gender Identity Disorder” (“GID”) would later be added to the DSM in its third incarnation (DSM-III) in 1980, with three subtypes, including “transsexualism” for adolescents and adults, GID of childhood for children, and a third type for cases that did not meet the requirements of the other two. DSM-III 261–66 (1980). A revision to the third edition in 1987 added another category: “A GID of adolescence or adulthood, nontranssexual type.” DSM-III 76–77 (rev. 1987). In 1994, the fourth edition of the DSM condensed these categories into a single diagnosis of GID in children, adolescents, and adults. DSM-IV 532–38 (1994). In 2013, the fifth and latest edition would remove GID entirely and add “Gender Dysphoria,” defined as “[a] marked incongruence between one’s experienced/expressed gender and natal gender of at least 6 months in duration,” “associated with clinically significant distress or impairment in social, occupational, or other important areas of functioning.” DSM-V 452–53 (2013).

Transgender people have also been barred from military service for much of the 20th and 21st centuries. In 1963, for instance, Army Regulation 40-501 declared individuals exhibiting “behavior disorders as evidenced by . . . transvestism” mentally unfit for service. ¶ 6-32 (May 17, 1963). Over time, this exclusion was codified across Department of Defense regulations, which listed “transsexualism” and “other gender identity disorders” among disqualifying medical conditions. *See* DOD Directive 6130.3 ¶ 2-34(b) (Mar. 31, 1986); DOD Instruction 6130.03 at 48 (Apr. 28, 2010). The ban on transgender service members was lifted in 2016, but it has shifted ever since. Directive-Type Memorandum (DTM) 16-005: Military Service of Transgender Service Members (2016) (lifting ban); Directive-Type Memorandum (DTM) 19-004: Military Service by Transgender Persons and Persons with Gender Dysphoria (reinstating ban in 2019 with limited exemptions); Exec. Order No. 14004, 86 Fed. Reg. 7471 (2021) (lifting ban); Memorandum from Secretary of Defense to Senior Pentagon Leadership, et al., Prioritizing Military Excellence and Readiness (Feb. 7, 2025) (reinstating ban).

Judicial challenges to exclusions from military service often met little success. In *Doe v. Alexander*, 510 F. Supp. 900 (D. Minn. 1981), a transgender woman challenged her discharge under Army Regulation 40-501; the court dismissed the claim as non-reviewable. Similarly, in *Leyland v. Orr*, 828 F.2d 584 (9th Cir. 1987), the Ninth Circuit upheld the discharge of a transgender woman under Air Force Regulation AFR 160-43, which disqualified individuals who had undergone gender-affirming surgery. The court expressly rejected the need for an individualized assessment of mental health or fitness to serve, affirming the categorical exclusion. *Id.* at 586.

3. Lawmakers Historically Have Sought to Deprive Transgender People of Civil Rights Protections in Public Accommodations and Employment.

Beginning in the late 1980s, legislators deliberately inserted language into major federal antidiscrimination statutes to exclude transgender people from legal safeguards in public accommodations and employment.

In 1988, the Senate adopted an amendment to exclude “transvestism” from coverage under the Fair Housing Act, making it the first antidiscrimination law to explicitly attempt to exclude transgender people. Kevin Barry et al., *A Bare Desire to Harm: Transgender People and the Equal Protection Clause*, 57 B.C. L. Rev. 507, 528–29 (2016) (hereafter Barry et al.). According to Senator Jesse Helms, who proposed the amendment and previously that term had objected to other legislation on similar grounds, “Transvestism and other compulsions . . . were moral problems, not mental handicaps.” *Id.* at 527 (quoting 134 Cong. Rec. 19,727 (1988)). Accordingly, “the first courts to hear FHA claims of . . . gender identity discrimination dismissed them out of hand, often with little analysis.” Rigel C. Oliveri, *Sexual Orientation and Gender Identity Discrimination Claims Under the Fair Housing Act After Bostock v. Clayton County*, 69 U. Kan. L. Rev. 409, 425 (2021) (citing *Miller v. 270 Empire Realty LLC*, No. 09-CV-2857, 2012 WL 1933798, *5–6 (E.D.N.Y. Apr. 6, 2012) (R&R adopted); *Swinton v. Fazekas*, No. 06-CV-6139T, 2008 WL 723914, *5 (W.D.N.Y. Mar. 14, 2008)).

The legislative exclusions continued, accompanied by anti-transgender rhetoric by lawmakers. In passing the Americans with Disabilities Act, two senators characterized transvestism and transsexualism as

“sexual deviant behavior” with a “moral content to them.” D Dangaran, *Bending Gender*, 137 Harv. L. Rev. 237, 254 (2024). As Senator Helms put it, “[H]ow in the world did you get to the place that you did not even [ex]clude transvestites? . . . What I get out of all of this is here comes the U.S. Government telling the employer that he cannot set up any moral standards for his business[.]” Barry et al. 531–32. When the bill reached the House of Representatives, the language was modified, listing transvestism, gender identity disorders, and transsexualism alongside “pedophilia, exhibitionism, voyeurism . . . or other sexual behavior disorders” as excluded from the definition of “disability” under the scope of the ADA. 42 U.S.C. § 12211(a)–(b). “[T]ransvestism, [gender identity disorders], and transsexualism were excluded, not because they were not medical conditions, but rather because the people who had these conditions . . . were deemed so depraved as to be unworthy of civil rights protections.” Barry et al. 538–39.

Two years later, Congress passed identical exclusions in amendments to the Rehabilitation Act. *See* Rehabilitation Act Amendments Act of 1992, Pub. L. No. 102–569, 106 Stat. 4344 (codified as 29 U.S.C. § 705(20)(F)(i) (2012)). Before these amendments, “federal disability antidiscrimination law recognized gender identity disorders as an impairment that may constitute a disability under the ADA’s precursor, the Rehabilitation Act of 1973.” Barry et al. 522. For instance, in *Doe v. U.S. Postal Serv.*, a District of Columbia court held that discrimination on the basis of “transsexualism” could violate the Rehabilitation Act. 1985 WL 9446, at *2–3; *accord Blackwell*, 656 F. Supp. at 714–15 (same, regarding “transvestitism”). Opponents of transgender rights cited these favorable decisions as “egregious” applications of

federal disability law. Barry et al. 535–37. As noted, Congress responded by amending the Rehabilitation Act to codify the same ADA exclusions.

States mimicked the ADA’s exclusions to narrow their own state law definitions of “disability.” Before the ADA, “state disability antidiscrimination laws presented a diverse set of definitions for the term ‘disability’ (or handicap). None of these laws explicitly excluded [gender identity disorders].” Barry et al. 523. After the ADA’s passage, 10 states “imported the ADA’s exclusions.” *Ibid.*

4. Transgender Victims Historically Have Been Excluded from Legal Deterrents and Protections Against Violence.

Transgender victims of violence are often disbelieved—or criminally charged themselves⁹—by police officers and prosecutors: “Years of anecdotal evidence and recent alarming empirical data show a disturbing ambivalence (or worse) from police when responding to reports of violence by Black trans victims.” Fields 977. Traditional civil protections against violence, like restraining orders, have also been largely unavailable to transgender people. *See, e.g.,* Sharon Stapel, *Falling to Pieces: New York’s Civil Legal Remedies Available to Lesbian, Gay, Bisexual, and Transgender Survivors of Domestic Violence*, 52 N.Y.L. Sch. L. Rev. 247, 249 (2007–2008) (New York state statutory criteria for civil

⁹ CeCe McDonald, a Black transgender woman, was initially charged with second degree murder for accidentally killing a male attacker in self-defense. Stryker at 209; Gill-Peterson 53. In 1973, four transgender women went to the police station to report an assault and were arrested at the police station for cross-dressing. Redburn 705–06.

order of protection excludes many transgender victims of domestic violence). This discrimination and demonization extends to the courtroom itself, where attackers invoke the “trans panic defense” to mitigate or excuse their crimes against transgender people. Cynthia Lee, *The Trans Panic Defense Revisited*, 57 Am. Crim. L. Rev. 1411, 1432 (2020) (hereafter Lee).

The trans panic defense is closely related to the “gay panic” defense, which has been pursued in courtrooms across the country since the 1960s. W. Carsten Andresen, Note, *Comparing the Gay and Trans Panic Defenses*, 32 Women & Crim. Justice 219, 223 (2022) (hereafter Andresen). This defense is typically invoked by a man against a transgender woman. See Lee 1432–37. Essentially, a defendant claims he was “repulsed” that he was attracted to or consensually sexually active with a “man” and accordingly, reacts with violence. Aimee Wodda & Vanessa R. Panfil, “*Don’t Talk to Me about Deception*”: *The Necessary Erosion of the Trans* Panic Defense*, 78 Alb. L. Rev. 927, 935–36, 941–42, 956 (2015). By invoking his victim’s transgender identity, the defendant seeks to excuse his violence on the ground that discovering that identity can reasonably compel someone to lose control. See Lee 1435; Andresen 223.

Even today, “trans women still remain vulnerable to fatal violence because of the gay and trans panic defenses.” Andresen 219. Take, for instance, the 2013 killing of Islan Nettles, a 21-year-old Black transgender woman. T. Anansi Wilson, *Black, Trans(gressive) Lives: Furtive Blackness & the Surround of Extralegal Violence*, 26 Geo. J. Gender & L. 1223, 1231–33 (2025). James Dixon spotted Nettles walking down the street in Harlem and began flirting with her. *Id.* When Dixon’s friend yelled, “that’s a guy,” Dixon flew into a

rage, demanding to know whether Nettles “was a man” before punching her and knocking her to the ground. *Id.* Battered beyond recognition, Nettles fell comatose and died days later. Lee 1413. During his police interrogation, Dixon offered a “trans panic” defense, arguing that he was deceived and should be excused for beating Nettles to death. Wilson at 1231–32. The district attorney recommended a 17-year sentence; Dixon received 12 years. Wilson 1233; *cf.* Andresen 223 (discussing 2002 California murder case where jury was unable to reach a verdict after defendants asserted trans panic defense).

In 2014, California became the first state to ban the “trans panic” defense. Movement Advancement Project, Criminal Justice: Gay/Trans Panic Defense Laws, <https://www.lgbtmap.org/img/maps/citations-panic-defense-bans.pdf> (visited Nov. 8, 2025). *Thirty* states, however, still permit it.¹⁰ *Id.* This senseless and discriminatory “trans panic defense” has systematically excluded transgender victims of violence from the same protections the legal system afforded cisgender, straight victims.

5. Transgender People Historically Have Been Excluded from Recognition and Rights in Familial Institutions.

States and state actors historically have restricted transgender individuals’ rights in marriage and parentage, and the corresponding rights that come with such recognition.

¹⁰ In 2013, the American Bar Association unanimously passed a resolution urging legislators to curtail the availability and effectiveness of the trans panic defense. ABA, Resolution 113A (Feb. 2013), <https://lgbtbar.org/wp-content/uploads/2014/02/Gay-and-Trans-Panic-Defenses-Resolution.pdf> (visited Nov. 12, 2025).

Transgender parents have had their natural rights stripped or limited due to their transgender status. For instance, in *Daly v. Daly*, the Nevada Supreme Court labeled a transgender parent’s transition as tantamount to choosing to terminate her own parental rights, reasoning that “[i]t was strictly [Appellant’s] choice to discard his [sic] fatherhood and assume the role of a female who could never be either mother or sister to his [sic] daughter.” 715 P.2d 56, 59 (Nev. 1986). *See also* Noa Ben-Asher, *Transforming Legal Sex*, 102 N.C. L. Rev. 335, 360 (2024) (collecting authority “document[ing] discrimination against transgender parents in custody and visitation disputes”); Sonia K. Katyal & Ilona M. Turner, *Transparenthood*, 117 Mich. L. Rev. 1593, 1628 (2019) (finding that 63% of transgender parents lost custody from 1971–2015).

Before this Court’s landmark decision in *Obergefell v. Hodges*, 576 U.S. 644 (2015), courts similarly debated transgender people’s right to marry. In *Anonymous v. Anonymous*, 325 N.Y.S.2d 499, 501 (N.Y. Sup. Ct. 1971), a New York trial court held, “[n]o legal relationship could be created by” a marriage involving a transgender woman and a cisgender man. *Ibid*. Five years later, New Jersey became the first state to uphold the validity of a transgender person’s marriage to a cisgender partner. *M.T. v. J.T.*, 355 A.2d 204, *cert. denied*, 71 N.J. 345 (1976). Still, over two decades later, a Texas appellate court refused to recognize a transgender woman’s marriage, holding that she was legally male despite surgery and updated legal documents. *Littleton v. Prange*, 9 S.W.3d 223, 231 (Tex. App. 1999). That 1999 ruling had the effect of denying Christie Littleton, a widow bringing medical malpractice claims, standing to sue as a surviving spouse. Currah 106 (“Someone working for Prange’s insurance company came up with a brilliant idea: if they could convince the court that

Christie Littleton, classified as male at birth, was still legally male, her marriage would be invalid. If she wasn't the surviving spouse, she would lack standing to sue.”).

Other courts adopted a similar approach. *In re Ladrach*, 513 N.E.2d 828, 830–32 (Ohio Prob. 1987) (rejecting New Jersey’s “very liberal posture” and denying marriage application); *Kantaros v. Kantaras*, 884 So. 2d 155, 161 (Fla. Dist. Ct. App. 2004) (invalidating marriage between transgender man and cisgender woman as part of custody dispute); *Frances B. v. Mark B.*, 355 N.Y.S.2d 712, 713, 717 (N.Y. Sup. Ct. 1974) (finding annulment appropriate because a transgender man could not fulfill the procreative purpose supposedly implicit in marriage). Such decisions also had consequences for inheritance and surviving-spouse rights. *See, e.g., In re Estate of Gardiner*, 42 P.3d 120, 122, 137 (Kan. 2002) (holding that a transgender widow did not have inheritance rights).

CONCLUSION

This country has experienced a painful, persistent, “longstanding pattern of discrimination in the law” against transgender people. *Skrmetti*, 605 U.S. at 554 (concurrence). This “demonstrated history,” *id.* at 557, counts for something: It strongly supports the conclusion, under 90 years of this Court’s precedents, that transgender people indeed are deserving of a “more searching judicial inquiry” into laws targeting their status. *Carolene Prods.*, 304 U.S. at 152 n.4.

For the foregoing reasons, and those in Respondents’ briefing, this Court should apply heightened scrutiny to bans that categorically exclude transgender women and girls from school-sponsored sports, and affirm the measured judgments of the Fourth and Ninth Circuits.

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November 17, 2025

APPENDIX

APPENDIX TABLE OF CONTENTS

	Page
APPENDIX:	
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APPENDIX

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