

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,
Respondents.

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

**BRIEF OF THE TRANSGENDER LAW CENTER,
GENDERS & SEXUALITIES ALLIANCE NETWORK,
AND PFLAG, INC. AS *AMICI CURIAE*
IN SUPPORT OF RESPONDENTS**

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INTERESTS OF *AMICI CURIAE*

Amici curiae are non-profit organizations committed to eliminating discrimination against transgender and gender non-conforming (hereinafter “transgender”) people and broadly supporting the transgender community. In connection with this mission, *amici* frequently work with transgender athletes and their families to advocate for their equal treatment under the law and for their ability to live authentically and without fear of discrimination in society at large.

Amici have a strong interest in the outcome of this case and are uniquely positioned to aid the Court in understanding how bans on transgender girls and women in sports harm Respondents, all transgender athletes, and the larger transgender community.¹

Transgender Law Center (“TLC”), co-counsel for *amici*, was founded in 2002 and is the largest national, trans-led organization working to set all people free. TLC champions the right of all transgender and gender non-conforming people to make their own choices and live freely, safely, and authentically. Prioritizing BIPOC,² disabled, and HIV+ communities, TLC advances community-driven strategies that harness trans knowledge, power, and

¹ Pursuant to Supreme Court Rule 37.6, counsel for *amici* certify that they authored this brief in its entirety and that no party or its counsel, nor any other person or entity other than *amici* or their counsel, made a monetary contribution to this brief’s preparation or submission.

² Acronym for Black, Indigenous, and other People of Color.

joy to ensure that all transgender people not only survive but thrive at all ages and phases of life. TLC also pursues impact litigation and policy advocacy to defend and advance the rights of transgender people, transform the legal system, minimize immediate threats and harms, and educate the public about issues impacting our communities.

Genders & Sexualities Alliance Network (“GSA Network”) is a next-generation LGBTQ racial and gender justice organization that empowers and trains queer, transgender, and allied youth leaders to advocate, organize, and mobilize an intersectional movement for safer schools and healthier communities. GSA Network connects more than 1,000 clubs across the nation, and the National Association of GSA Networks, which unites 40 statewide networks of GSA clubs. GSA Network also supports student-led campaigns through an online campaign and petition platform for transgender and queer youth across the country.

PFLAG, Inc., founded in 1973, is the nation’s largest organization dedicated to supporting, educating, and advocating for LGBTQ+ people and those who love them. PFLAG members include transgender and non-binary young people and their families across the country, and PFLAG is committed to supporting those families as they navigate discriminatory restrictions on participating in sports teams and accessing communities that help them thrive.

SUMMARY OF THE ARGUMENT

West Virginia’s H.B. 3293 categorically bans women and girls who are transgender from participating in women and girls’ sports from middle school through college. Idaho’s H.B. 500 lodges an even broader ban, prohibiting women and girls who are transgender from participating in women and girls’ sports “from primary school through college, and at every level of competition, from intramural to elite teams.”

Amici present the Court with six personal narratives from transgender athletes to demonstrate the impact that participation and/or exclusion from sports teams and athletic involvement has on transgender people. Through the stories in this brief, *amici* account for a broad range of transgender athletes, including those who have excelled and found community on their teams as well as those who have experienced obstacles to thriving in athletics. These narratives convey how involvement in sports teams is often a fundamental part of social life and growth for young people, and how depriving transgender youth of the opportunity to participate in athletics has devastating effects.

Athletics are a cornerstone of communities across the United States. Sports teams provide a special source of camaraderie, physical and mental health, and community for transgender athletes, particularly at a time when transgender people face high rates of discrimination, harassment, and violence.

The experiences of transgender athletes, as described herein, demonstrate that categorically banning transgender people from school sports causes severe and lasting harm. *Amici* therefore urge the Court to affirm the judgments of the Ninth and Fourth Circuits.

ARGUMENT

I. Personal Stories Of Transgender Athletes Convey How Participation in Athletics Is Central To The Growth Of Transgender Youth And Is Beneficial to All Athletes

The following stories from transgender athletes demonstrate that participation in athletics have had profound impacts on their personal development, psychological wellbeing, and sense of dignity in the most positive ways. The stories from athletes who reside in states where they may live authentically without exclusion from athletics reveal not only the emotional, social, physical, and mental health benefits they personally derive from their participation in sports, but also show that those positive outcomes inure to the benefit of their teams, competitors, and local communities as well.

Some of the stories that follow also expose the severely detrimental effect of state laws that discriminate against transgender athletes by barring their participation on sports team on the basis of their sex and transgender status.

A. Melissa and Leslie Doe³

Melissa is an active and social high school sophomore. When asked what she wants the Court to know about her and fellow transgender athletes, she pleaded:

Please consider how much this means to all student athletes, [and] trans athletes deserve the same opportunity to play. We aren't professional athletes, we're kids and teens who just want the chance to play, to be part of a team, to learn the game, teamwork and leadership, and to have fun like everyone else. Imagine how much it would suck if your child wasn't allowed to *play*.

Melissa's mom, Leslie, describes Melissa as highly self-motivated and the type of daughter who is "just on top of it," balancing homework, maintaining straight As, friends, and, crucially, being a varsity volleyball player.

In middle school, Melissa was on the track team, and she played volleyball in eighth grade. When she started high school last year, volleyball just "clicked" for Melissa. Leslie explains that Melissa is, and has always been, a "natural athlete. She just knows where to be on the court and she has a good eye." During the off season, Melissa plays beach volleyball.

³ Pseudonyms are used to protect Melissa and her family's safety and privacy.



In addition to being a talented athlete, Melissa has emerged as a trusted teammate and leader on her team. Melissa encourages her teammates to keep their spirits high, regardless of whether their team is winning or losing. Melissa's friends who are not on the team love to watch her play and form a Melissa fan section in the bleachers at her games.

Melissa's natural ability and her dedication to the sport earned her a position on the varsity team

this school year and garnered her attention from competitive travel teams. Melissa was recruited by an accomplished travel club team and was offered a spot. This opportunity would have pushed Melissa to develop her strengths as an athlete and would have given her visibility to prospective college recruiters. But Leslie did not feel safe having Melissa join the team because Melissa is transgender.

Although Colorado law does not bar transgender athletes from participating in sports, joining a travel team would require travel to states that do have such bans. And although Melissa is “stealth”⁴ and has been on puberty blockers for years, Leslie feared the worst could happen if her daughter were outed as transgender, particularly while away from home. Melissa could be publicly humiliated, ostracized, or worse, subjected to physical violence and threats. Leslie also feared that potential scrutiny about her daughter would be unfair given that Melissa never experienced the elevated testosterone levels that come with an endogenous male puberty and because, while she is talented on the volleyball

⁴ The term “stealth” is used to describe transgender or gender-expansive individuals who do not disclose their gender identity in their public or private lives (or certain aspects of their public and private lives). *Stealth*, PFLAG, INC. NATIONAL GLOSSARY, <https://pflag.org/glossary/> (last visited Nov. 11, 2025). While Melissa and her family wholeheartedly embrace her living life as her authentic self, being transgender is just “one small part of who she is.” For this reason, Melissa is “stealth” about her gender identity and only shares that she is transgender with close friends.

court, there are other girls on the team who are more talented and accomplished.

Because the risks outweighed the potential benefits, Melissa's parents made the unfortunate compromise of having her try out for a regional club team that did not require out-of-state travel. While this opportunity will provide coaching and growth, it has also been hugely disappointing for Melissa, who longs to challenge herself and actualize her fullest potential as a volleyball player.

After high school, Melissa plans to study engineering in college. Participating in volleyball is a key aspect of what she is looking for in a college experience. Melissa has her sights set on playing competitively at the Division I or II level. But state bans on transgender athletes' participation jeopardize these aspirations. In her own words, "I'm stealth, so most people don't know I'm trans, and carrying that secret is really hard. But on the court with my team, that weight lifts. I'm surrounded by people who have my back, who make me laugh, cheer for me, and who feel like family."

Playing volleyball has been life-saving and instrumental for Melissa's mental health, her friendships, and her overall school experience. Melissa and Leslie emphasize that all students deserve the right to play sports, with the key word being "play."⁵

⁵ Source: October 29, 2025 teleconference interview. Photograph included with permission.

B. Soju Hokari

Soju is a recent college graduate from Eugene, Oregon. During her time at Emory University in the city of Atlanta, Soju excelled academically, worked an on-campus job at the university's Office of LGBT Life, and played fiddle with musician friends. In addition to having a busy academic and social life, a cornerstone of Soju's college experience was being on the ultimate frisbee team.

Like many kids, Soju played soccer in elementary school. By middle school, she pivoted to cross-country and track. Soju enjoyed soccer and running, but everything changed in seventh grade when she joined an ultimate frisbee team. Ultimate frisbee combined Soju's favorite parts of soccer and running – being part of a team and the camaraderie – while setting aside the aspects she did not enjoy – such as the aggressive physical contact that occasionally accompanied soccer. The connectedness of the team is what made ultimate frisbee become her sport of choice. As Soju remarked, “You literally can't score without another person.” Soju loved the sport so much that she spent her summer breaks at an ultimate frisbee camp.

As is often the case in ultimate frisbee, Soju's middle school team was co-ed. It was also around this time when Soju began to recognize her female gender. By the end of eighth grade, Soju came out to her parents as transgender.

Going into high school, Soju wanted to continue playing ultimate frisbee and her parents were

dedicated to helping her achieve her goal. Soju knew that playing on the boys' team would have felt terrible and inauthentic for her, but she was not sure how she would be received on the girls' team. Soju's parents had a clear perspective on the situation – because playing sports was a necessary aspect of being a happy and health kid, there would need to be a place for Soju.

With this mindset, Soju's parents reached out to her high school's girls' ultimate frisbee coaches shortly after the school year started, and soon thereafter, Soju was the newest member of the girls' ultimate frisbee team. Soju's coach and teammates were supportive of her joining their team.

With the support of her parents, coaches, and teammates, Soju excelled. Despite being a self-described “quiet” person, Soju quickly became a leader on her team. She was chosen to be a team captain her sophomore year, in large part because of her ability to get along with everyone and bring the team together.

Soju's leadership in the sport continued as she started coaching at middle school ultimate frisbee summer camps after her sophomore year of high school. These were the same summer camps Soju attended when she was in middle school. A few summers later, Soju directed and coordinated the camps. A highlight during those summers was creating a space within athletics where kids of all backgrounds felt like they belonged, and to then see those students continue to play ultimate frisbee for years to come.

Despite thriving in her sport, the COVID-19 pandemic took away Soju's chance to compete at Nationals with her high school team. But the following year, Soju played for the Oregon club team and her team went on to win the under 20 Youth Club Championships.



Continuing to play ultimate frisbee was a natural next step as she went off to college, and her leadership skills were critical to her personal success and the success of her college team. When she joined the ultimate frisbee team her freshman year, there

was an abundance of players, most of whom had never played before coming to college. Soju – with years of experience playing and teaching the sport – quickly became an anchor of her college team.

Soju continued playing outside of the academic year, including for the semi-pro Atlanta Soul, and for Atlanta Ozone, a club team that attended Club Nationals in 2022.

During her senior year of college, Soju’s ability to participate in ultimate frisbee was put at risk when the Georgia state legislature introduced Senate Bill 1 (“SB 1”). Under SB 1, public and private elementary schools, middle schools, high schools, and colleges would be required to strictly designate sports teams as either male, female, or co-ed based on an athlete’s sex assigned at birth.

For Soju, not being able to play the sport she loved since she picked up a frisbee in seventh grade would have been devastating. In her own words, the looming threat of having her beloved sport taken away from her was the “first time [she] wasn’t getting joy from playing ultimate frisbee.” Soju went on to speak to the Georgia legislature and community meetings about SB 1 to express her disapproval. Soju was frequently accompanied by her teammates who also agreed that transgender athletes deserved to be able to play sports while remaining true to their authentic gender identities.

On April 28, 2025, Georgia Governor Brian Kemp signed SB 1 into law. Soju closed out her senior year on the team before SB 1 went into effect. In the

aftermath of SB 1, Soju has seen first-hand the pain that the ban has caused athletes in Georgia. A sport that, in Soju’s experience, had been centered on community and “collective joy” has sadly become another way to expressly exclude and oppress individuals based on their gender identity, a punishment for simply living as who they are.

When asked what she would want the Supreme Court to know about the impact of bans on transgender athletes’ participation in sports, Soju emphasized that sports have a special way of bringing people together to reach a common goal, and that bans on participation have been painful to transgender athletes like her, but also to the teams where they are cherished for their contributions.⁶

C. Patricio Manuel

Before becoming an acclaimed professional boxer, Patricio was an introverted kid growing up in a racially diverse neighborhood in Los Angeles. He was born into a family of sports fans who brought him to games as much as possible. Patricio fondly remembers his uncle taking him to his first WNBA game.

Patricio was a self-described tomboy growing up and recalls roughhousing with his sister for fun. When he was 12 or 13 years old, he practiced jeet kune do martial arts and was on the softball team. Patricio continued playing softball into high school, but decided to focus on boxing after his grandmother

⁶ Source: October 15, 2025 teleconference interview. Photograph included with permission.

gifted him boxing lessons at the famous L.A. Boxing Gym in downtown Los Angeles.

Learning how to box at 16 years old was transformative for Patricio. During puberty, he recalls disassociating from his body and feeling “raw and untough.” Boxing, on the other hand, made Patricio feel strong and self-assured. He remembers how good it felt to walk into the boxing gym for the first time and have a coach remark “Oh I hope she’s here to box. She looks tough.”

During his first few years of boxing, Patricio had a lot to learn and was thrown into fights with mixed success. But with disciplined practice over the years, he emerged as a formidable fighter. Patricio later went on to become a five-time national amateur champion in the women’s division and competed in the first-ever women’s boxing trials for the US Olympic Team in 2012.

Despite being in peak physical condition, in 2012, Patricio was medically disqualified from the trials due to a shoulder injury. While rehabbing his shoulder, Patricio had time to contemplate who he was as a person outside of the boxing world. This time led to the realization that for years he had compromised his true identity for his sport. Reflecting on his childhood, Patricio recalled daydreaming about his future as a man, not as a masculine woman. In 2013, Patricio came out as genderqueer, before eventually coming out as a transgender man.

The boxing community is small and tight knit, and Patricio's network of coaches, teammates, and sparring partners was no exception. Patricio did not hide his gender, and the boxing world was aware of his gender transition. Having garnered significant respect in the sport, Patricio's gender identity was largely accepted by his peers, but not universally. Painfully, after transitioning, Patricio's long-term coach cut all ties with him and refused to train him. In a combat sport where a coach can make the difference as to whether the fighter lives or dies, trust between a coach and boxer is essential. Patricio, having literally trusted this coach with his life, was stunned and dejected by this experience.

After his former coach refused to train him, a fellow boxer invited Patricio to spar at her gym in Duarte, California. Despite having to make a 70-mile drive to Duarte multiple times a week to train, the head coach there was supportive and welcoming, and Patricio has continued to train with him for over ten years.

After rehabilitating his shoulder and medically transitioning, Patricio was ready to get back into the boxing ring, but this time to compete in the men's division. But getting fights as an openly transgender man was difficult. During amateur fights, competitors would be matched up with Patricio only to drop out at the last minute. The perception from other men was that, if Patricio won, the opponent would be stigmatized as having "lost to a girl," and if he lost, the opponent would be seen as having "beat a girl."



Patricio's next obstacle was getting licensed to box professionally as a man. The California State Athletic Commission at the time had a policy governing transgender athletes' participation – which Patricio satisfied – but the Commission dragged out the process. Fortunately, Patricio was ultimately able to obtain a license from the Commission. Since then, Patricio has won most of his fights as a professional boxer in the men's division. He is looking forward to his next fight and plans on retiring in the coming years.

The sport has helped Patricio come into his own as a man. While he does not believe that anything is inherently masculine or feminine, he has personally received a lot of confidence in his male gender through his practice of boxing. In boxing, Patricio says, “you have to learn how to be calm under pressure and not give into anger.” Patricio credits boxing with teaching him how to regulate his emotions and be in control of himself, adding that “that is the kind of masculinity I always wanted.”

When reflecting on the bans prohibiting transgender athletes from playing sports, Patricio thinks about the ways in which sports will suffer by not having transgender participants. Patricio reflected:

Sports are an opportunity for all of us to share space with people from different walks of life. It’s why Jackie Robinson’s desegregation of baseball or Nelson Mandela’s use of rugby to unify a post-apartheid South Africa were so powerful. I’ve seen firsthand how my presence in boxing gyms has shifted people’s understanding of what it means to be transgender. When coaches, teammates, and sparring partners make space for me in the ring, it becomes a bridge for them to make space for transgender people in the world at large. I’ve witnessed that transformation happen.

Patricio also reflects on what transgender athletes have to lose from bans on their participation:

Regardless of level, sports save lives. I don't think sports get enough credit for their life-saving modalities. We get community, a sense of agency, a chance to move our bodies and be present, do something enjoyable and just fun. It's a brief moment where you can be separated from [racism, sexism, and] the other -isms of life, even if just for the practice. Our gyms are community, places where you can connect. That's worth fighting for. [Sports are] a place to put down the burdens people carry and be accepted in a fold.⁷

D. Alyssa and Erin Roe⁸

Alyssa is a high school senior in the midst of the college application process. She has plans to attend medical school after college and hopes to become a pediatrician.

As a busy mom with two kids, Erin, Alyssa's mother, had always tried to enroll her children in co-ed sports where they could play together. Growing up, Alyssa and her sister played T-ball, a lot of soccer, and swam. Alyssa's soccer teams were always a large source of fun and social connection. She also was on a

⁷ Source: October 30, 2025 teleconference interview. Photograph included with permission.

⁸ Pseudonyms are used to protect Alyssa and her family's safety and privacy.

club swim team for many years. For most of her childhood and adolescence, Alyssa lived in Ohio and Texas with her family.

By the time middle school rolled around, however, most sports had become gender-segregated. So when Alyssa came out as transgender early in middle school, it changed her relationship with sports, mostly for the worse. Despite always having enjoyed soccer, and playing on a club team for several years, Alyssa stopped playing because that team and the only team at her school were boys' only teams, which would have made Alyssa feel out of place. In high school, Alyssa was able to join the swim team but was not allowed to compete. Segregating Alyssa from her teammates and preventing her from competing made her feel ostracized from the team, as if she was just "a random person."

Going into her sophomore year, Alyssa and Erin moved to Oregon due to Texas' discriminatory laws banning medical for transgender youth. The move ensured that Alyssa could continue to receive lifesaving healthcare. Alyssa and her mom also looked forward to having Alyssa play soccer again without experiencing arbitrary and exclusionary bans on her participation. Before the move to Oregon, Erin connected with Alyssa's future soccer coach who was supportive of having Alyssa join the team. In Alyssa's words, "I really enjoyed soccer. After not playing it for years, I was glad I was finally able to do something I had a lot of fun with."

As the new school year started, Alyssa joined the girls' soccer team, where she met her first friends

in Oregon, including senior varsity players who made a conscious effort to include Alyssa, saying hi to her in the hallways and cheering for her on the field. Her new friends and the kindness of the team's seniors made Alyssa feel welcomed and included in her new community.

Erin reflects that it was reassuring as a parent to hear that Alyssa was embraced by the soccer team. Erin also saw first-hand at games and practices that Alyssa felt safe and like she belonged. In Erin's words, "[Alyssa] was just another girl on the field, it was a relief for Alyssa to be included again."

From Erin's perspective, Alyssa's involvement in sports has always been bigger than just kicking around a soccer ball:

There are values that we share as a nation about teamwork, leadership, hard work, skill building, and working through problems...sports in public education are a huge part of that. When [Alyssa] started playing soccer, suddenly I was there on the sidelines with thirty other parents, all different backgrounds, we all had kids out on the field. We all could be part of the school community and the bigger community and have something in common.

Despite her love of the game and her teammates, Alyssa had a particularly challenging incident that contributed to her leaving the team. During a history class, Alyssa's teacher gave the

students an assignment to create a political cartoon. One of Alyssa's classmates, who was also on her soccer team, created a disparaging caricature of a transgender woman athlete. The teacher had students vote for the best political cartoon, and many students in the class voted in favor of the transphobic cartoon. Alyssa did not want to go back to practice after that.

For physical and mental health reasons, Alyssa did not have the ability to return to soccer this school year. Alyssa has, however, returned to the pool and now works as a lifeguard. When she is not working or studying, she spends time with her family and reading manga comics.

When asked about their thoughts on bans prohibiting transgender students from playing sports, both Alyssa and Erin said that being part of a sports team is good for all kids and that transgender kids should just have the chance to play.⁹

E. Jordan Poe¹⁰

Jordan remembers running from the time he could walk. Sports were always a large part of his life growing up – he played soccer as a kid and ran varsity track and cross-country throughout high school. But Jordan's true passion is ultimate frisbee.

Jordan started playing ultimate frisbee in middle school and went to ultimate frisbee camps during the summer. As a talented athlete, he

⁹ Source: October 17, 2025 teleconference interview.

¹⁰ Pseudonym is used to protect Jordan's safety and privacy.

practiced with both the middle school and the high school team through 7th and 8th grade, so Jordan quickly learned the ins and outs of the game and even served as team captain.

In high school, Jordan continued to play ultimate frisbee. The high school team, which was designated as a gender expansive team, was proudly inclusive and committed to making transgender players feel welcomed. The team's embrace of transgender students made it a safe and supportive place for Jordan when he came out as non-binary during his sophomore year. Jordan's team, which he again captained, was also competitive and successful on a national stage.

Today, Jordan is a senior in college and is applying for post-graduate fellowships. He will graduate in the spring with a bachelor's degree in U.S. History and a minor in music. When Jordan is off the ultimate frisbee field, he enjoys playing guitar and silk screen printing unique t-shirts for his friends and teammates.

Ultimate frisbee is a significant part of Jordan's life, and he plays on his college's men's team where he continues to be an instrumental player – both for his skills on the field and for his sportsmanship. Every year at the ultimate frisbee Division III College Championships, a position for sportsmanship is issued, called the Spirit Award, whereby all teams rate each other on positive attitude, safe game play, and overall physical composure. Jordan's team won the Spirit Award his sophomore year and Jordan became the Spirit Captain – responsible for collating

scores across teams and working with representatives from each team – the following year. Jordan would go on to become the team’s captain during his senior year.

Jordan’s experience playing on the men’s team has been overwhelmingly positive. His male teammates occasionally ask curious questions about his gender identity or inquire about his body, but Jordan has been consistently supported by his teammates.

Jordan says that the experience of playing ultimate frisbee has helped him as a transgender person to come to appreciate his body. While he does experience gender dysphoria, he says that sport is a unique place where he feels like he’s “celebrating [his] body and what it’s capable of.” Using his body to help his team and a “group of people I care about a lot” is one of the most joyful parts of the sport to him.

While Jordan has not personally been subjected to prohibitions on transgender athlete’s participation in sports, every time transgender sports bans make the news, he is put in the position of having to justify his existence. Jordan explains:

When you’re a transgender player on the team, you’re the transgender representative to the team. Every time there’s a new bill or a lawsuit about whether trans people should be in sports, even as a transmasculine person on a men’s team where no one is worried about my presence on sports

teams, I become this representative who needs to explain why binary gender is not biological and what the policies are in our sport – those questions get directed to me... As long as transness is in the discussion of sports – should we let [transgender people] in or not – every trans athlete feels [the impact] and is thinking, “does that person think I belong? Do they agree with [the bans]?” It constantly raises the question of whether we belong. It’s hard to have conversations about the topic when the baseline question is not “how are we going to do inclusion” and instead is “are we going to do inclusion at all.”

Indeed, the project of excluding transgender people from sports fails to account for the ways in which sports are enriched by transgender athletes. From Jordan’s perspective, transgender athletes “raise the bar” for creating inclusive and safe teams. He explains that in his experience, he and his transgender teammates have been particularly attuned to when competitive behavior crosses the line into being hurtful, and how to create a positive team experience that leads to success. “As an athlete, you dream about winning championships, the next tournament, [and] the social [element of the game]. I think my trans teammates are expanding what it means to be dreaming like that.”¹¹

¹¹ Source: November 4, 2025 teleconference interview.

F. CeCé Telfer

“For my competitors, the goal every meet is to win. For me, it is to leave the track alive.”

CeCé Telfer, the National Collegiate Athletic Association (“NCAA”) national women’s champion in the 400-meter hurdles, has faced a lot of adversity in her life, but has survived and continues to pursue her dream of competing in track and field. CeCé explains, “I cry every time I’m on the track to compete because of the gratitude I feel to be there.”

For CeCé, athletics have served as a safety net and vehicle for authenticity throughout her life. CeCé’s athletic background helped her fit in and protected her from the bullying she faced off the field for her femininity. Having a soft voice, CeCé’s gender and sexuality were scrutinized by her classmates and teachers throughout her childhood. But in sports, she found allies and community and was always a top pick on her teams. During middle school and high school CeCé played volleyball, badminton, tennis, cheerleading, gymnastics, swimming and water polo. She was also active in other extracurricular student life, singing and dancing in talent shows, and serving as a student counselor in her high school’s student mediation team.

CeCé fled a tumultuous and unsupportive home life when she got into Franklin Pierce University. She had worked nights and weekends at a Mexican restaurant and ice cream parlor in high school to support herself and afford college. At Franklin Pierce, CeCé made friends with a tight knit crew of girl friends and joined the track and field team. She

“redshirted” her freshman year — a practice where an athlete practices with the team but does not compete. During her sophomore year, CeCé began competing with the men’s team where she was one of the team’s top competitors. Despite her love of the sport, CeCé felt out of place on the men’s team as a woman and eventually told her coach she needed to stop for her mental health.

In her senior year, CeCé returned to the field but this time to compete on the women’s team where she belonged. With the encouragement of friends on the team, CeCé approached the coach of the women’s team and poured her heart out, explaining that track was her “whole life,” her “therapy” that had saved her life many times, and that she was a woman and wanted to compete on the team that aligned with her female gender.

Her coach was elated. This coach became one of CeCé’s greatest advocates, clearing her participation with the athletic director of the university, the president and the NCAA. When the fall semester began, her coach sat the entire team of ninety-nine athletes down to announce the news and make clear that CeCé would be a welcomed member of the women’s team. CeCé underwent the blood testing required by NCAA rules at that time and was determined to be eligible to compete under those rules.

While she had finally made her dream come true competing in track and field as her true self, CeCé faced bullying and harassment from her competitors and their coaches, including slurs at track meets and regular death threats online. At CeCé’s

first track meet on the women's team, athletes from competing teams made derogatory remarks about CeCé and her teammates stood up for her. CeCé's coach also faced harassment and threats. CeCé was singled out not only for being transgender, but also because she was often one of the few Black athletes at track meets held at colleges with a predominantly white student body. At one such meet where taunts directed at CeCé were particularly bad, the NCAA threatened to disqualify a competitor who was bullying her.

In 2019, CeCé qualified for and competed at the NCAA Division II Indoor Track & Field Championships in Kansas City after excelling at a New England championship event. CeCé qualified for the 2019 NCAA Division II Outdoor Track & Field Championships in Kingsville, Texas. For her safety, the NCAA provided security guards at every national competition she participated in, and arranged separate travel for her apart from her team. While her competitors arrived days prior to each meet, allowing them to acclimate to the time zone and rest, CeCé had to travel the day before to minimize the risk of harm and stayed in her hotel room when she was not on the field.

Fortunately, CeCé also had many allies who wanted to see her excel. A fellow transgender athlete told her to stop limiting her greatness and give it her all — something CeCé sometimes struggled with due to the self-consciousness she felt because of all the ways she was targeted. Not only did her coach and her teammates cheer her on at every meet and stand up for her in the face of bullying, but also, other athletes

she competed against often publicly showed their support. During the outdoor championships, one of the competitors in her heat grabbed her hand supportively and raised it when her rankings were announced. This supportive competitor also gave her the pep talk she needed before competing in the 400-meter hurdles event.

During the 400-meter hurdles at the 2019 outdoor championships, CeCé's team cheered her on from start to finish and drowned out everyone else. With the cheers of her team, she pushed herself and won first place making her team and university proud.



After this victory, some of her competitors approached her and thanked her for making them better athletes. One competitor credited CeCé for helping her run faster than she ever had, breaking her personal record and putting her on the map for the Olympic Trials.

CeCé faced increased threats and harassment after being repeatedly targeted online. But CeCé knows firsthand that women athletes' bodies are under relentless scrutiny and pressure, and that competing is a lifesaving way to find power and authenticity on her own, and that her participation enriches the performance of the teams she has been a part of and those she competes against.

CeCé was set to compete in the 2020 Olympic Trials, but was unaccepted the day before allegedly due to a technicality regarding how she submitted her medical information. Nevertheless, CeCé has stayed focused and intent on pursuing her dreams of being a professional elite women's athlete. She moved to California in 2020 where she trains on her own, unable to secure a coach or team given the increasing restrictions and bans that prevent transgender women from competing in women's sports. In 2025 the U.S. Olympic and Paralympic Committee ("USOPC") banned transgender women from competing on the USA women's team.

CeCé and her supporters are clear that these restrictions, and the intense vetting that transgender women athletes must undergo, are part of the long and unfortunate tradition of policing women's bodies, especially Black women's bodies, and ultimately only

serve to harm all women athletes and the sport at large.¹²

CONCLUSION

As demonstrated by the stories of transgender athletes shared in this brief, bans on transgender women and girls' participation in athletics are profoundly detrimental to the personal, physical, social, and psychological development and wellbeing of many members of the transgender community, their families, teams and teammates. *Amici* respectfully request that the Court affirm the judgments of the Ninth and Fourth Circuits.

¹² Source: November 7, 2025 teleconference interview. Photograph included with permission.

Dated: November 17, 2025 Respectfully submitted,

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