

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 *AMICUS CURIAE* ANDRAYA YEARWOOD
IN SUPPORT OF RESPONDENTS**

GENE MICAH WISSINGER
Counsel of Record
KIMBERLY A. LEHMANN
NATALIE A. GRIECO
LEVY RATNER, P.C.
80 Eighth Avenue, 8th Floor
New York, NY 10011
(212) 627-8100
mwissinger@levyratner.com

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Counsel for Amicus Curiae

387360



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(800) 274-3321 • (800) 359-6859

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INTEREST OF AMICUS¹

Amicus Andraya Yearwood is a young transgender woman from Connecticut who participated in track and field during high school. She is referred to multiple times throughout the briefs of Petitioners, *amici* briefs filed in support of Petitioners, and the Joint Appendices. Ms. Yearwood submits this *amicus* brief so that her experience is accurately reflected in the Court's record. She also has an interest in the question of transgender girls competing on teams that match their gender identity and, by bringing her experiences to the Court's attention, hopes to illustrate how permitting transgender students to participate on teams that align with their identity positively impacts their well-being and ability to grow into healthy and productive adults.

SUMMARY OF THE ARGUMENT

Eight years after her limited success competing in high school girls' track events in Connecticut, Andraya Yearwood remains part of the national conversation over transgender girls and women competing in sports. Ms. Yearwood began medically and socially transitioning from male to female following middle school and began competing on the girls' track team in 2017 in accordance with the rules of the Connecticut Interscholastic Athletic Conference. After she achieved some success in certain events, Ms. Yearwood attracted media attention and

1. Pursuant to Supreme Court Rule 37.6, *amicus* states that no counsel for any party authored this brief in whole or in part and no entity or person, aside from counsel for *amicus*, made any monetary contribution intended to fund the preparation or submission of this brief.

adults threatened and harassed her online and at track meets. During her senior year, she became the target of an injunction to stop her from running on the girls' team in the action styled *Soule v. Conn. Assoc. of Schs., Inc.*, Case No. 20-cv-00291 in the United States District Court for the District of Connecticut.

Although *amici* supporting Petitioners, and those who sought to enjoin Ms. Yearwood from running, argue that cisgender girls “can’t win” when competing against transgender girls, Ms. Yearwood’s athletic record shows that non-transgender female athletes repeatedly outperformed her. Unlike girls she competed against, Ms. Yearwood was not recruited to run track in college. However, she performed well academically and recently completed a master’s program at Columbia University. The intangible benefits that Ms. Yearwood gained from participating as part of her high school girls’ track team imbued her with confidence and purpose that will serve her well throughout life. Respectfully, Ms. Yearwood asks the Court to preserve that opportunity for other transgender girls.

ARGUMENT

Amicus Andraya Yearwood is discussed in the briefs of Petitioners, six *amici* briefs filed in support of Petitioners, and referred to throughout the Joint Appendices. See Brief of Pet. Bradley Little, *et al.*, at 4; Brief of Pet. West Virginia, *et al.*, at 6-7; Brief of Business Leaders as *Amici Curiae* in Support of Petitioners Bradley Little, *et al.* & West Virginia, *et al.*, at 9; Brief of *Amicus Curiae* Independent Women’s Law Center Supporting Petitioners Bradley Little, *et al.* & West Virginia, *et al.*, at 11-13; Brief

of 35 Athletic Officials and Coaches of Female Athletes as *Amici Curiae* in Support of Petitioners Bradley Little, *et al.* & West Virginia, *et al.*, at 9-10; Brief of Alabama *et al.* as *Amici Curiae* Supporting Petitioners Bradley Little, *et al.*, at 27. Brief of *Amici Curiae* Female Athletes United, *et al.* in Support of Petitioners, at 1, 4-5; Brief of 96 West Virginia Legislators as *Amici Curiae* in Support of Petitioners, at 2, 4-6; J.A. Idaho 108, 322, 325, 350-51, 353, 355-56, 359-66, 378; J.A. West Virginia 251-52, 465, 469, 473, 475-77, 480, 484-88, 493, 499-500, 506-07, 2357

While references in the Joint Appendices are often made to Ms. Yearwood by name, she and Terry Miller—another transgender high school athlete from Connecticut—are frequently referred to collectively in the briefing as “high school athletes” or “high school runners” from Connecticut.² These references lack context for Ms. Yearwood’s win/loss record on the track and provide no real consideration for her experience as a high school student athlete.³

2. Petitioners and various *amici* hurtfully and incorrectly refer to Ms. Yearwood and Ms. Miller as “males” or “boys” throughout their filings but could have accurately and respectfully referred to them as transgender girls without damage to legal or rhetorical positions before the Court.

3. Petitioner Idaho incorrectly names NCAA athlete CeCe Telfer—a collegiate runner with no ties to Connecticut—as an athlete from Connecticut, specifically “one of the male athletes from Connecticut who competed as a girl.” Brief of Pet. Bradley Little, *et al.*, at 10. This careless reference to Ms. Telfer as a Connecticut athlete illustrates why Ms. Yearwood felt it was important to file this brief.

I. Ms. Yearwood's Transition

Ms. Yearwood is a twenty-four-year-old transgender woman who graduated from Cromwell High School in Cromwell, Connecticut, where she competed on the high school girls' track team. Cromwell is a small suburban town in central Connecticut with a school system of fewer than 2000 students consisting of a single elementary school, intermediate school, middle school, and high school. *See About Us*, CROMWELL PUBLIC SCHOOLS, <https://perma.cc/PRA9-TBPR>. Ms. Yearwood was assigned the sex of male at birth, but always knew she was a girl. From a young age, Ms. Yearwood knew she was different from other kids and often dressed in women's clothes and heels as a small child. She became her true self the summer before she started the eighth grade when she came out as transgender.

Prior to starting high school, Ms. Yearwood legally changed her name and began medical treatment to delay and block male puberty. She never experienced full puberty in her assigned sex. Ms. Yearwood began hormone therapy in high school, and when she competed in girls' track events had the hormone levels of typical non-transgender girls. The students in Ms. Yearwood's graduating class were, in large part, the same students she attended school with in the first grade. Classmates, parents, teachers, and the larger Cromwell community watched Ms. Yearwood transition, and few were surprised. When Ms. Yearwood started high school, she was living all aspects of her life as a girl.

Ms. Yearwood's classmates and teachers used female pronouns after her transition. Although people outside

of Cromwell criticized Ms. Yearwood's participation in girls' track events, public negativity rarely made its way inside the four walls of her high school. Everyone at school knew she was transgender and treated her as a girl. Ms. Yearwood had the full and unconditional support of her family during her transition and, with their encouragement, joined the track team. Ms. Yearwood's parents focused on her overall well-being during high school and felt that track provided their daughter with a sense of belonging and self-confidence that was far more important than whether she won or lost races.

II. Ms. Yearwood's Participation in Track

Ms. Yearwood began running track in seventh grade and developed a love of running. She initially participated in boys' events. But after she started taking puberty blockers and living all aspects of her life as female, Ms. Yearwood was placed on the girls' team in accordance with the rules of the Connecticut Interscholastic Athletic Conference ("CIAC"), which governs athletic competition in the state. Ms. Yearwood participated on the girls' track team at Cromwell High School for the 2018, 2019, and 2020 indoor seasons and the 2017, 2018, and 2019 outdoor seasons. Although she participated in many events throughout high school, Ms. Yearwood's best events were sprints, the outdoor 100-meter and the indoor 55-meter and 60-meter.

Ms. Yearwood worked incredibly hard during the track season, training at least two hours every day after school. Her coaches and teammates supported her and pushed her to excel. For Ms. Yearwood, participation in track was about creating resilience in herself and having fun while doing something she loved. Like high school girls

the world over, Ms. Yearwood sought acceptance and a sense of place in high school. Being a member of the girls' track team provided her with friendships, confidence, and generally improved her physical and emotional well-being. Ms. Yearwood was an integral part of her team and developed close bonds with her teammates and coaches.

Ms. Yearwood trained daily to make her team and family proud, working extremely hard for every medal she won. Yet, like most athletes, Ms. Yearwood was no stranger to defeat. Being assigned male at birth did not mean that Ms. Yearwood automatically had an advantage over non-transgender girls. Winning and losing for Ms. Yearwood depended on the events she entered and the strength of her competition.

Ms. Yearwood occasionally competed in the long jump, triple jump, and high jump (her favorite event) but never finished first in any of those events. *See Andraya Yearwood: Track & Field Bio*, Athletic Net, <https://perma.cc/P375-CUUV> [hereinafter "Yearwood Record"]. During the 2020 indoor season, Ms. Yearwood placed second at a qualifying meet with a long jump distance of 15' 04.75". *See id.* This unremarkable performance stands in stark contrast to Chelsea Mitchell's record that season. *See id.*; *Chelsea Mitchell: Track & Field Bio*, Athletic Net, <https://perma.cc/AH7M-A84V> [hereinafter "Mitchell Record"]. Ms. Mitchell—who sought to enjoin Ms. Yearwood from participating in girls' track in the action *Soule v. Conn. Assoc. of Schs., Inc.*, Case No. 20-cv-00291 (D. Conn.) and who joined the Brief of *Amici Curiae* Female Athletes United *et al.* Supporting Petitioners West Virginia—excelled at the long jump. Ms. Mitchell won first place at the CIAC Combined Class S Championship, second

place at the CIAC Combined State Open Championship, and second place at the 33rd New England Indoor Track and Field Championships with a distance of 19' 2.5", *almost four feet more* than Ms. Yearwood's long jump that season. *See* Yearwood Record; Mitchell Record. Ms. Yearwood's performance fell short of many other girls in these events; in particular, taller girls, including members of Ms. Yearwood's own team, held a competitive edge over her in jumping events.

In her outdoor running career, Ms. Yearwood's performance was strong but did not outmatch her competitors. Although Ms. Yearwood participated in seven statewide and New England regional championship races in the 100-meter dash, she only took first-place one time in that event. *See* Yearwood Record. In the outdoor 200-meter, indoor 300-meter, and outdoor 400-meter events, she only won a state championship once, placing first in the 200-meter at the outdoor 2017 CIAC Class M Championship. *See id.* While she frequently placed below the top spot, Ms. Yearwood still enjoyed the chance to participate in the sport she loved. Non-transgender girls often beat Ms. Yearwood, including Ms. Mitchell. *See* Yearwood Record; Mitchell Record. Despite Petitioners' and *amici's* repeated insinuation that transgender status all but guaranteed Ms. Yearwood victory in girls' high school athletics, she lost the 2019 Outdoor CIAC Combined State Open Championship to Ms. Mitchell in the 100-meter dash, placing fourth while Ms. Mitchell claimed the title and went on to win the 74th New England Interscholastic Track and Field Championships. *See* Yearwood Record; Mitchell Record.

Though Ms. Yearwood enjoyed several wins during her indoor career, she was frequently outperformed by other athletes. Her finishes in the 55-meter dash—her best and most frequently raced event—resulted in three third-place medals, one second-place medal, and one first-place medal out of the seven state and New England regional championship races she participated in from 2018 to 2020. *See* Yearwood Record. Although she was a favorite to win the 2020 indoor state championship, a false start at the CIAC Combined Class S Championship ended her season. *See id.* Ms. Mitchell won that race and went on to win the title at the CIAC Combined State Championship, and place third at the 33rd New England Interscholastic Championships. *See* Mitchell Record.

Ms. Yearwood was a good runner who took home medals at the conference and state level but never set a state record or made a dent in the national track and field scene. Ms. Yearwood qualified to compete in one national championship: the 2019 New Balance Indoor Nationals. She entered with a top-ten ranking in the 60-meter dash but was eliminated in the preliminary round, finishing in thirty-first place. *See* Yearwood Record. Ms. Yearwood did not establish a single state record for competition in Connecticut girls' state track and field records. *See id.* Alanna Smith—another Plaintiff in *Soule v. Conn. Assoc. of Schs., Inc.*, who also joined the Brief of *Amici Curiae* Female Athletes United *et al.* Supporting Petitioners West Virginia—had a more notable career on the state and national stage. Ms. Smith holds the current Connecticut record for the girls' indoor 55-meter dash. *See Connecticut Girls State Indoor Track and Field Records*, My Track & Field Records, (last updated Mar. 26, 2025), <https://perma.cc/U5NC-2WER>. She also holds the current Connecticut

record for the girls' indoor 60-meter dash with her eighth-place finish in the preliminary round of the 2022 New Balance Indoor Nationals, the same championship competition where Ms. Yearwood placed thirty-first in the preliminaries in 2019. *See id.*

Ms. Yearwood's moderate success was overemphasized in the media and, as legislative history demonstrates, her record was front of mind during debates concerning the statutes under review by the Court. *See* J.A. West Virginia at 251-55 (claiming participation of transgender students competing in women's sports "came to the surface in the United States" and became a "national debate" after Ms. Yearwood and Ms. Miller "won a combined 15 girls' state indoor and outdoor championship races"); J.A. Idaho at 27, 29, 108 (authoring sponsor asserting same championship statistic and declaring "the Connecticut story . . . is a story that Idaho should pay very much attention to"). This haphazard use of Ms. Yearwood's record continues in briefing before the Court. Two *amici* briefs filed in support of Petitioners indicate that Ms. Yearwood and Ms. Miller, when considered together, set 17 meet records and won 15 women's championships without distinguishing between their respective athletic performances, implying that transgender girls possess universally superior physical ability. *See* Brief of 35 Athletic Officials and Coaches of Female Athletes as *Amici Curiae* in Support of Petitioners at 9-10; Brief of 96 West Virginia Legislators as *Amici Curiae* in Support of Petitioners at 2 and 6. Another *amici* erroneously claims that Ms. Yearwood and Ms. Miller broke 17 "state records." *See* Brief of *Amicus Curiae* Independent Women's Law Center Supporting Petitioners at 12.

Petitioners’ respective briefs do not lend any clarity to the discussion of Ms. Yearwood and Ms. Miller’s putative record, describing them collectively as winning “13 Connecticut girls’ state championships” and that they “took 15 track championship titles.” *Compare* Idaho Pet. Br. at 4 *and* West Virginia Pet. Br. at 6-7. Ms. Yearwood won three state championships. *See* Yearwood Record. Ms. Miller won twelve state championships. *See Terry Miller: Track and Field Bio*, Athletic Net, <https://perma.cc/P6H8-9UEG>. Neither Ms. Yearwood nor Ms. Miller’s championship performances are outliers when compared to non-transgender girls. Ms. Mitchell, who competed at the same time as Ms. Yearwood and Ms. Miller, won ten state championships. *See* Mitchell Record. Ms. Smith, who was two years younger, fared even better during high school, winning seventeen state championships—more than Ms. Yearwood and Ms. Miller combined. *See Alanna Smith: Track & Field Bio*, Athletic Net, <https://perma.cc/UQP8-TL9Y> [hereinafter “Smith Record”]. The distortion of this basic information is, in part, what motivated Ms. Yearwood to file this brief so that others do not prioritize their objectives at the expense of her actual competitive record and experience.

III. Harassment for Participating in Girls’ Track

While in high school, Ms. Yearwood became the focus of media attention by local and national news outlets, including a featured segment on Good Morning America. *See e.g., At Cromwell High School, Transgender Athlete Competes with Girls for the First Time*, Hartford Courant (April 7, 2017), <https://perma.cc/E2WP-2R2T>; *Transgender Track Stars Speak Out as Critics Allege Unfair Advantage*, Good Morning America (June 22,

2018), <https://perma.cc/L8FR-RVAR>; *Connecticut Runners Part of Debate Over Transgender Athletes*, The Seattle Times (February 24, 2019), <https://perma.cc/9EPG-KKNX>. Following publication of the first local news story about her participation in girls' track in April 2017, Ms. Yearwood was bombarded online with hateful tweets and social media posts that attacked and vilified her for participating in the sport she loved.

Although Ms. Yearwood found she could try and block out the online vitriol by avoiding social media, it was much harder to distance herself from the attacks she faced at track meets. The confrontations were not from the girls she ran against, but adults who frequently made threats that scared her. Because it was difficult for Ms. Yearwood to use the restroom at track events without enduring abuse, she avoided doing so. When it was absolutely necessary for Ms. Yearwood to use the restroom or a locker room, she went with her teammates, who provided safety from adults who confronted her. At her final track meet, a security guard escorted Ms. Yearwood because the heckling was so bad. Adults who did not have children participating in the competition spent the afternoon yelling at Ms. Yearwood and booing when she ran. Reflecting, Ms. Yearwood thinks that people often forget she was just a girl when she became a focal point for so much attention and hate. The reality was that Ms. Yearwood was a minor child worried that adult strangers might harm her for running a race.

Ms. Yearwood tried to avoid the negativity that surrounded her participation in girls' track. But despite her family's best efforts to shield her from the cruelty and attacks, Ms. Yearwood's running and mental health were

negatively impacted by the public attention. Although she began to feel disheartened, Ms. Yearwood found many supportive people and used her experience to speak out for other transgender athletes. Amid the increased scrutiny, track practice became a safe space where Ms. Yearwood could focus on doing what she enjoyed. Running made her feel free and allowed her to clear her mind.

IV. Life after High School Track

In the weeks leading up to the outdoor season of her senior year, the parents of some of Ms. Yearwood's competitors filed a lawsuit seeking to enjoin Ms. Yearwood (and Ms. Miller) from running in girls' events. *See Soule v. Conn. Assoc. of Schs., Inc.*, Case No. 20-cv-00291. Although the suit remains active, the motion for a preliminary injunction was mooted after COVID-19 upended the girls' senior year and prevented anyone from running.

Although she received a few letters of interest from colleges, Ms. Yearwood was not recruited and ultimately decided not to pursue running competitively after high school. Girls she competed against in high school—including girls involved in the lawsuit alleging that Ms. Yearwood deprived them of opportunities for exposure to college recruiters—did join Division I collegiate track programs. *See Mitchell Record*; *Smith Record*. Although Ms. Yearwood continues to run recreationally because she loves the sport, her competitive track career ended at Cromwell High School.

Fortunately, running is not Ms. Yearwood's only talent. She has always loved the study of language and weighed several options for where she would attend college. She

chose North Carolina Central University, a historically Black institution in Durham, North Carolina, where she fully participated in campus life as an out transgender woman without facing harassment or discrimination. In May 2024, Ms. Yearwood graduated with a double major in Spanish and interdisciplinary studies and minors in political science and women and gender studies. Her university named her the Outstanding Graduating Senior of 2024 in recognition of her academic achievements and contributions to the community. Ms. Yearwood was awarded several post-graduate scholarships and prizes, including a fellowship to study Portuguese at Columbia University and a scholarship to study for the summer at the Middlebury Language Schools prior to starting her fellowship. In May 2025, Ms. Yearwood graduated from Columbia University with a master's degree in Latin American Studies and is currently performing freelance work and volunteering in her community while she contemplates pursuing a doctorate in linguistics.

Ms. Yearwood feels very fortunate that she grew up in Cromwell, Connecticut, where she was treated like a girl in all aspects of her life and did not face discrimination in school. She finds it preposterous that someone could possibly think that she, or any other transgender girl, would subject herself to the treatment she endured competing in girls' track just to win a medal or set a record. Prior to being placed on the girls' team, Ms. Yearwood spent a great deal of time coming to terms with her gender, coming out to her family and friends, and then living consistently as a girl in school and in the community. Ms. Yearwood is incredibly grateful that there were policies in place allowing her to participate in girls' sports in high school. It was vitally important to her well-being

that Ms. Yearwood fully participate in her community and in school as a girl, including on the track team. Her high school experiences, including the persistence and work ethic she developed by participating in track, helped her excel in college and complete her master's degree. Ms. Yearwood's positive experiences at Cromwell High School illustrate that transgender girls' participation in sports enriches not only the life of the individual student but the larger community.

Ms. Yearwood was a high school girl who loved to run. She understands that parents who challenged her participation in girls' track wanted the same thing that her parents wanted—to see their children happy and doing the things they love. Because all children are important and deserving of love and protection, she urges the Court to uphold laws that protect transgender girls' participation in sports. Transgender girls and their communities benefit from allowing them to compete on teams that match their gender identity. Preventing transgender children from joining teams that match their identity negatively impacts their ability to grow into happy, productive, and well-adjusted young adults like Ms. Yearwood. The resilience, confidence, and friendships that Ms. Yearwood gained through her participation in girls' track will stay with her for life. She only wishes the same for other transgender athletes.

CONCLUSION

For the foregoing reasons, the decisions below should be affirmed.

Respectfully submitted,

GENE MICAH WISSINGER

Counsel of Record

KIMBERLY A. LEHMANN

NATALIE A. GRIECO

LEVY RATNER, P.C.

80 Eighth Avenue, 8th Floor

New York, NY 10011

(212) 627-8100

mwissinger@levyratner.com

November 17, 2025

Counsel for Amicus Curiae