

No. 26-286

IN THE
Supreme Court of the United States

OLYMPUS SPA, *et al.*,

Petitioners,

v.

ANDRETA ARMSTRONG, EXECUTIVE DIRECTOR
OF THE WASHINGTON STATE HUMAN RIGHTS
COMMISSION, *et al.*,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

**AMICUS BRIEF ON BEHALF OF WOMEN
AND GIRLS HARMED BY SEX SELF-ID
POLICIES IN WASHINGTON STATE
(IN SUPPORT OF NEITHER PARTY)**

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Cases	
<i>Olympus Spa v. Armstrong</i> , 138 F.4th 1204 (9th Cir. 2025)	3, 21
Statutes and Other Authorities	
20 U.S.C. §§ 1681–1688	25
Sarah Barker, <i>It Makes Me Feel Expendable</i> , June 21, 2025, https://substack.com/@ thefemalecategory/p-166473218	9
Boys vs Women, https://boysvswomen.com/#/	9
Bureau of Prisons, <i>Transgender Offense Stats</i> (2023), https://x.com/NoXY_USA/ status/1695205078376845782/photo/2	12
Matt Calkins, <i>I was a sports columnist at the Seattle Times for 11 years. This is why I resigned</i> . Aug. 20, 2026, https://mattycee.substack.com/p/i- was-a-sports-columnist-at-the-seattle?utm_ source=post-email-title&publication_ id=10563175&post_id=212028578&utm_ campaign=email-post-title&isFreemail=fa lse&r=42vj42&triedRedirect=true&utm_ medium=email	18

Cited Authorities

	<i>Page</i>
James Cantor, <i>Do trans-kids stay trans- when they grow u?p</i> , Sexology Today, Jan. 11, 2016, http://www.sexologytoday.org/2016/01/do-trans-kids-stay-trans-when-they-grow_99.html	24
E. Ann Carson & Rich Kluckow, <i>Prisoners in 2022 – statistical tables.</i> , Bureau of Justice Statistics, November 2023, https://bjs.ojp.gov/library/publications/prisoners-2022-statistical-tables	12
Carol Dansereau, <i>Affirming Trans Identities is Harmful</i> , June 19, 2024, https://caroldansereau.substack.com/p/affirming-trans-identities-is-harmful	23
Carol Dansereau, <i>Aggressive, Shrieking, Drowning Us Out</i> . Aug. 16, 2022, https://caroldansereau.substack.com/p/aggressive-shrieking-drowning-us	17
Carol Dansereau, <i>Hitchhiker’s Guide (Part IV): Other Tactics & Who’s Behind Gender Identity’s Rapid Ascent</i> , section on Suppression, May 2022, https://caroldansereau.substack.com/p/hitchhikers-guide-part-iv-other-tactics	16
Carol Dansereau, <i>Ho hum, another boy steals girls’ sports trophies . . . please publicize this latest theft!</i> , Nov. 5, 2023, https://caroldansereau.substack.com/p/ho-hum-another-boy-steals-girls-sports	8

Cited Authorities

	<i>Page</i>
Carol Dansereau, <i>The Anti-Science Disaster of Gender Ideology in the Schools</i> , Dec. 10, 2022, https://caroldansereau.substack.com/p/the-anti-science-disaster-of-gender	18
Dentons et al., <i>Only Adults? Good Practices in Legal Gender Recognition for Youth</i> , Nov. 2019, https://www.trust.org/wp-content/uploads/2024/09/downloaded_file-69.pdf	19
Caroline Downey, <i>Meet the trans-identifying male felons of the Washington State women's prison</i> , National Review, July 30, 2024, https://www.nationalreview.com/news/meet-the-trans-identifying-male-felons-of-the-washingtons-womens-prison/	11, 13
Storm Ervin et al., <i>Addressing Trauma and Victimization in Women's Prisons</i> , Urban Institute, October 2020 (updated April 2021), https://www.urban.org/research/publication/addressing-trauma-and-victimization-womens-prisons	12
<i>FAIR & Faith Booher-Smith v. WA Dept. of Corrections & Tim Lang</i> , Case 2:26-cv-01419, Complaint For Compensatory Damages and Injunctive Relief; US District Court Western District of Washington State, April 27, 2026, https://www.americafirstpolicy.com/assets/uploads/files/AFPI_WDOC_Complaint_04.27.26.pdf	14

Cited Authorities

	<i>Page</i>
Foundation Against Intolerance and Racism, <i>Civil Rights Complaint to U.S. Department of Education's Office of Civil Rights</i> , (Feb. 17, 2025), https://www.fairforall.org/wp-content/uploads/2025/02/Civil-Rights-Complaint_Tumwater-Schools.pdf	8
Jess Grant, <i>The Left isn't Right. It's Wrong</i> , May 30, 2025, https://jessgrant1.substack.com/p/the-left-isnt-right-its-wrong	17
Hecheated.org, <i>Washington Results</i> , (August 2026), https://hecheated.org/high-school_results_Washington.html	7
CalPoly Humboldt, <i>Sexualized Violence Statistics</i> , https://www.humboldt.edu/supporting-survivors/educational-resources/statistics	4
Independent Council on Women's Sports ICONS), <i>Science</i> , https://iconswomen.com/science/	9
Shan Jumper, <i>Transgender criminology in the United States</i> . The Prison Journal, (2026), https://journals.sagepub.com/doi/abs/10.1177/00328855251396460	13
Brandi Kruse, <i>Girls forced to wrestle, share locker rooms with biological boys</i> , Undivided with Brandi Kruse, January 23, 2026, https://www.youtube.com/watch?v=2J__8IhNb98&t=15s	10

Cited Authorities

	<i>Page</i>
Brandi Kruse, <i>Teen wrestler claims school ignored assault by trans opponent</i> , Undivided with Brandi Kruse, Feb. 9, 2026, https://www.youtube.com/watch?v=1fRxfdYmAtU&t=779s	8
La Casa de las Madres, <i>A Brief History of the Battered Women's Movement</i> , March 11, 2026, https://www.lacasa.org/blog/2026/3/10/a-brief-history-of-the-battered-womens-movement	4
Mara Lake, <i>The Undoing of a Unique Sisterhood in Female Erasure</i> 379-392 (Ruth Barrett, ed., 2016)	16
Shane Lantz, <i>WA transgender athlete Veronica Garcia repeats as state track champion</i> , Seattle Times, May 31, 2025, https://www.seattletimes.com/sports/high-school/wa-transgender-athlete-veronica-garcia-repeats-as-state-track-champion/	7
Let Women Speak, Video of man trying to attack woman shortly before mob forced women speaking for women's sex-based rights out of a park in Tacoma, WA, October 2022, https://x.com/StandingforXX/status/1585352747528122369	17
MRSC, <i>New Rules Addressing Use of Gender-Segregated Facilities</i> , Jan. 14, 2016, https://mrsc.org/stay-informed/mrsc-insight/january-2016/new-rules-addressing-use-of-gender-segregated-faci	15

Cited Authorities

	<i>Page</i>
Whitney Munro, <i>Mother of Junior Olympian Speaks Out After Her Daughter Loses to a Male</i> , IW Features, June 27, 2024, https://www.iwfeatures.com/profile/elizabeth-wilson/	7
National PREA Resource Center, <i>86 percent of women in jail are sexual-violence survivors</i> , Nov. 11, 2017, https://www.prearesourcecenter.org/resource/86-percent-women-jail-are-sexual-violence-survivors	12
Ryan Nguyen, <i>Supreme Court trans athlete ruling: What it means for Washington</i> , Seattle Times, June 30, 2026, https://www.seattletimes.com/education-lab/supreme-court-trans-athlete-ruling-what-it-means-for-wa/	17
OSPI, <i>Gender-Inclusive Schools</i> , https://ospi.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/gender-inclusive-schools	6
Kim Parker et al., <i>American's Complex Views on Gender Identity and Transgender Issues</i> , Pew Research Center, June 28, 2022, https://www.pewresearch.org/social-trends/2022/06/28/americans-complex-views-on-gender-identity-and-transgender-issues/	21
RCW 49.60.020	20

Cited Authorities

	<i>Page</i>
RCW 49.60.040 (29)	22
RCW 49.60.400(4)	24
RCW 49.60.500	25
Benjamin Ryan, <i>List of lawsuits brought by detransitioners</i> , Jan. 30, 2026, https://x.com/benryanwriter/status/2017471549536661927/?utm_source=substack&utm_medium=email	24
Seattle Pub. Sch. 3211: <i>SP-Gender-Inclusive Schools: Transgender and Gender-Expansive Students Rights and Support</i> , https://www.seattleschools.org/about/school-board/policies/3211sp-gender-inclusive-schools-transgender-and-gender-expansive-student-rights-and-supports/	6
Komo Staff, <i>Man found in women’s locker room cites new transgender bathroom rule</i> , KOMO News, Feb. 18, 2016, https://komonews.com/news/local/man-found-in-womens-locker-room-cites-new-transgender-bathroom-rule	15
Society for Evidence-based Gender Medicine (SEGM), <i>Detransition: A Real and Growing Phenomenon</i> , May 30, 2021, https://segm.org/first_large_study_of_detransitioners	24

Cited Authorities

	<i>Page</i>
Society for Evidence Based Gender Medicine, <i>False Assumptions Behind Youth Gender Transitions</i> , December 30, 2022, https://segm.org/false-assumptions-gender-affirmation-minors	22-23
Sup. Ct. R. 37	1
Title IX, Education Amendments of 1972, 20 U.S.C. §§ 1681–1688 (1972), https://www.justice.gov/crt/title-ix-education-amendments-1972	25
TWS.org, <i>Legislative Week in Review</i> , January 17, 2006, https://tvw.org/video/legislative-week-in-review-2006011273/	18
U.S. Dept. of Education, <i>Title IX Special Investigations Team Launches Directed Investigation into Washington State Superintendent’s Office</i> , April 20, 2025, https://www.ed.gov/about/news/press-release/title-ix-special-investigations-team-launches-directed-investigation-washington-state-superintendents-office-0	25
U.S. Dept. of Health and Human Services, <i>Treatment for Pediatric Gender Dysphoria. Review of Evidence and Best Practices</i> (Nov. 19, 2025), https://opa.hhs.gov/sites/default/files/2026-06/gender-dysphoria-report.pdf	23

Cited Authorities

	<i>Page</i>
WA State Human Rights Commission, <i>Guide to Sexual Orientation and Gender Identity and The Washington State Law Against Discrimination</i> , 11/19/2024, https://www.hum.wa.gov/sites/default/files/public/publications/20241119_SO%20GI%20Guide.pdf	23
Wash. Admin. Code § 162-32	19
Wash. Admin. Code § 162-32-060	20
Washington State Department of Corrections, <i>Employee manual for the identification, treatment, and correctional management of transgender, intersex, and non-binary individuals</i> . (Aug. 15, 2023), https://doc.wa.gov/sites/default/files/2025-02/600-GU009.pdf	11
Washington State Department of Corrections, <i>Non-discrimination for individuals</i> , https://doc.wa.gov/sites/default/files/data/files/100500.pdf (July 17, 2023)	11
Washington State Department of Corrections, <i>Transgender, intersex, and/or non-binary individuals</i> , Aug. 17, 2023, https://doc.wa.gov/sites/default/files/data/files/490700.pdf	11

Cited Authorities

	<i>Page</i>
Washington State Legislature, House Bill Report ESHB 2661, 2006, https://lawfilesexternal.wa.gov/biennium/2005-06/Pdf/Bill%20Reports/House/2661.HBR.pdf	18
Denise Whitaker, <i>Woman, 80, banned from YMCA pool after clash with trans woman in locker room</i> , KOMO TV, Aug. 12, 2022, https://katv.com/news/nation-world/woman-80-banned-from-ymca-pool-after-clash-over-trans-woman-in-locker-room-washington-state-mountain-view-pool-port-townsend-controversy-alleged-code-of-conduct-violations	15
WIAA, <i>Gender Diverse Youth Sport Inclusivity Toolkit</i> , https://genderdiversity.org/gender-diverse-youth-sport-inclusivity-toolkit/	7

INTEREST OF AMICI CURIAE¹

This amicus brief is submitted on behalf of girls and women in Washington State who are harmed by the Olympus Spa and other Washington State entities being forced to admit males to female-only facilities and programs.

Amici come from many different backgrounds and political ideologies. They include women who call themselves “right-wing” and “conservative,” others who call themselves “centrist,” and others who call themselves “left-wing,” “progressive,” or “socialist.” Some Amici are religious while others are not. Amici include young women, middle-aged women, and senior citizens.

INTRODUCTION AND SUMMARY OF ARGUMENT

Amici and other girls and women in Washington State are deeply harmed by the Olympus Spa being forced to admit men. They have lost a precious place in which females bonded, felt safe, and took respite. Most of the Amici, and especially those who are survivors of male violence, are now unable to use the spa.

This loss is paralleled by concurrent losses throughout Amici’s lives. There are males in women’s shelters,

1. Pursuant to Rule 37, counsel for Amici affirm that no counsel for any party authored this brief in whole or part, and no person or entity, other than Amici made any monetary contribution to its preparation or submission, except that donations were received from James Levitt, Bruce Lesnick, and Jess Grant. All parties consented to, and received timely notice of, Amici’s intention to file.

sports, locker rooms, prisons, support groups and more. If women object, they are punished. They can even be investigated and fined by the Washington State Human Rights Commission (WSHRC) for defending their rights.

Discrimination law is being used to attack women's rights as the result of bait-and-switch legislative tactics, an irrational interpretation of ambiguous statutory language, suppression of all who object, and ubiquitous promotion of gender identity ideology. The Ninth Circuit decision displays obvious bias in favor of gender identity ideology which must be acknowledged and addressed.

Amici urge the Supreme Court to be aware of the implications of this case for girls and women. As the Court makes its decision, Amici implore it to act in a manner that will not further undermine the rights of girls and women. The Court should only grant certiorari if its review can address serious problems with the WSHRC's interpretation of discrimination law and resulting harm to the female sex class. Amici also urge the Court to acknowledge and address obvious Ninth Circuit bias in favor of gender identity ideology and its core tenets.

ARGUMENT

A. FORCING THE OLYMPUS SPA TO ADMIT MALES CAUSES SEVERE HARM TO GIRLS AND WOMEN.

The Olympus Spa once provided a female-only experience that women crave, need and deserve. For decades it was a refuge, a place of bonding, and a place of female solidarity.

At the spa, women are naked in a large area where the hot tubs, saunas, intimate services, and showers are. Elsewhere, they wear only thin short cotton wraps that provide minimal body coverage. In the heated relaxation rooms, women lie on the floor, often opening their wraps and sometimes napping.

Amicus Elizabeth Hummel explains: “The Olympus Spa was such a special and healing place for me and so many other women. It was a beautiful gift from traditional female Korean culture shared with all women in our area. At the spa, it didn’t matter what kind of body you had, how flabby or toned you were, how wrinkled. We were simply taking care of our female bodies and enjoying doing that with other women. Women need our separate spaces for more than privacy and safety—we also need them for female bonding.”

But all of that is history now. Using the Washington Law Against Discrimination (WLAD), males have gained entrance to the spa. This means that women who go there may now find themselves naked or barely clothed next to naked or barely clothed males, including in confined spaces like saunas and relaxation rooms. The Ninth Circuit claims that “patrons purchase commercial services at the Spa without regard to the identities of other patrons,”² but that is not true. They count on the spa to exclude males.

Amicus Sandra Forman Locklear describes encountering a male at the spa: “I noticed someone soaking in the center pool slowly rotating while boldly staring at the private anatomy of women in and out of

2. *Olympus Spa v. Armstrong*, 138 F.4th 1204, 1221 (9th Cir. 2025).

the pool. Typically, women don't do that, so I suspected this person might be a man. When he emerged from the pool, my suspicions were confirmed. I keep my clothes on in front of all men except my husband and felt sick and scared. I fled because the Human Rights Commission tells women that's what we must do when our boundaries are violated. There is now no sex-based privacy at Olympus Spa. The male gaze endures even there. That was not a 'she' unabashedly staring at us in Lynnwood like food at a buffet table."

Rendering the Olympus Spa mixed sex is a huge blow to women. Just one man instantly destroys a precious all-female experience. He tramples the rights of women to have a place of their own, to not be seen naked by men, and to not view male anatomy.

The presence of males also destroys women's sense of safety. Males are, on average, bigger and stronger than women, and can easily overpower them. Nearly all sexual assaults are perpetrated by males, and nearly all victims of those assaults are female. (An estimated 91% of victims of rape and sexual assault are female and 9% male. Nearly 99% of perpetrators are male.)³ These realities were part of why women fought for female-only spaces.⁴ Now male behaviors that would previously have been deemed voyeurism and indecent exposure are treated as perfectly

3. CalPoly Humboldt, *Sexualized Violence Statistics*, <https://www.humboldt.edu/supporting-survivors/educational-resources/statistics>.

4. See La Casa de las Madres, *A Brief History of the Battered Women's Movement*, March 11, 2026, <https://www.lacasa.org/blog/2026/3/10/a-brief-history-of-the-battered-womens-movement>.

acceptable. The discomfort of women is dismissed as irrelevant if it is acknowledged at all.

Most of the Amici now consider the Olympus Spa off limits because it is no longer female-only. Survivors of sexual violence, in particular, have lost access to it.

As Amicus Suzanne Ravet explains “Having endured sexual assault, I experience PTSD if I find myself in a vulnerable position vis-à-vis men. Having to see male anatomy on a naked man near me as I myself sit naked in a hot tub or sauna is simply unthinkable. It is far too distressing to even contemplate. So, I’ve lost access to the spa. This is a huge loss for me, and an incredible injustice to rape survivors and to all girls and women.”

Allowing men in a female-only spa undermines women’s ability to accurately discern sex and trust their self-protective instincts. Amicus Amy E. Sousa, MA Depth Psychology explains: “Female humans, like all female mammals, possess innate sex recognition instincts for reasons of both procreation and safeguarding. Asking women to deny our primal instincts for self-protection from males, especially when in vulnerable states of undress, is not just antithetical to all safeguarding protocols, but constitutes abuse by asking women to suppress our natural safety responses.”

Amici are aggrieved by the fact that Olympus Spa has been forced to admit men. An extraordinary female haven, a place of healing and shared female experience, has been turned into a place where men are present, where survivors of male violence dare not enter, and where women are required to agree that men are women.

B. THE TRAMPLING OF WOMEN’S RIGHTS IN OTHER REALMS UNDER THE GUISE OF ENDING DISCRIMINATION ALSO SEVERELY HARMS GIRLS AND WOMEN.

What’s happening at the Olympus Spa is happening throughout Washington State at other accommodations and institutions. Trans-identifying males—men who say they’re women—are trampling women’s boundaries and sex-based rights with impunity.

1. High School Sports and Locker Rooms

Citing Washington’s Law Against Discrimination, the Washington Office of the Superintendent of Public Instruction (OSPI) has directed all state school districts to adopt policies that allow any boy who declares himself a girl, or even just “gender expansive” to participate in girls’ sports.⁵ “Gender expansive” is defined as “a wider, more flexible range of gender identities than those typically associated with the binary (male or female) gender system.” Seattle Public Schools’ policy SP3211 is a typical example of what has been adopted by individual school boards.⁶ The Washington Interscholastic

5. OSPI, *Gender-Inclusive Schools*, <https://ospi.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/gender-inclusive-schools>.

6. Seattle Pub. Sch. 3211: *SP-Gender-Inclusive Schools: Transgender and Gender-Expansive Students Rights and Support*, <https://www.seattleschools.org/about/school-board/policies/3211sp-gender-inclusive-schools-transgender-and-gender-expansive-student-rights-and-supports/>.

Activities Association (WIAA) has implemented the same policy.⁷

As a result, significant numbers of males compete in girls' sports in Washington State. In the last five years, males in middle and high school competitions have placed in the top three at least 155 times, including at least 73 times when they came in first.⁸ Just a few examples include:

1) A boy who ran in girls' high school track, winning back-to-back 400-meter state titles in 2024 and 2025.⁹ Each time he ran he deprived a girl of the 1st place trophy, moved everyone else down in the rankings, and deprived a girl the honor of running in the championship race.

2) A boy who came in first in the girls' 1600-meter race at the Junior Olympics in Cashmere, Washington in 2024, seven seconds ahead of the top female.¹⁰

7. WIAA, *Gender Diverse Youth Sport Inclusivity Toolkit*, <https://genderdiversity.org/gender-diverse-youth-sport-inclusivity-toolkit/>.

8. Hecheated.org, *Washington Results*, (August 2026), https://hecheated.org/high-school_results_Washington.html.

9. Shane Lantz, *WA transgender athlete Veronica Garcia repeats as state track champion*, Seattle Times, May 31, 2025, <https://www.seattletimes.com/sports/high-school/wa-transgender-athlete-veronica-garcia-repeats-as-state-track-champion/>.

10. Whitney Munro, *Mother of Junior Olympian Speaks Out After Her Daughter Loses to a Male*, IW Features, June 27, 2024, <https://www.iwfeatures.com/profile/elizabeth-wilson/>.

3) A boy who skewed results in Washington State high school girls' cross-country meets in 2023.¹¹

4) An 18-year-old male who played on the Shelton High School girls' basketball team in 2025. A girl who objected was investigated for harassment and bullying for accurately stating "he is a man."¹² She was deemed to be in violation of WIAA's code of ethics.

5) Two boys who wrestle on the girls' team for Ridge High School in the Puyallup School District. One of them has been accused of sexually assaulting his female opponent during a match by allegedly penetrating her vagina with his finger, and holding it there, as she yelled in horror trying to let others know what was happening.¹³

These are only some examples of males in females' sports in Washington State.

All of this is thoroughly unfair to girls. It isn't just testosterone currently surging through boys' bodies that

11. Carol Dansereau, *Ho hum, another boy steals girls' sports trophies . . . please publicize this latest theft!*, Nov. 5, 2023, <https://caroldansereau.substack.com/p/ho-hum-another-boy-steals-girls-sports>.

12. Foundation Against Intolerance and Racism, *Civil Rights Complaint to U.S. Department of Education's Office of Civil Rights*, (Feb. 17, 2025), https://www.fairforall.org/wp-content/uploads/2025/02/Civil-Rights-Complaint_Tumwater-Schools.pdf.

13. Brandi Kruse, *Teen wrestler claims school ignored assault by trans opponent*, Undivided with Brandi Kruse, Feb. 9, 2026, <https://www.youtube.com/watch?v=1fRxYmAtU&t=779s>.

delivers their advantage. It is a wide array of physical differences between boys' and girls' bodies.¹⁴

Thus, even boys undergoing testosterone suppression retain huge unfair advantages over girls. As sports physiology expert Dr. Ross Tucker, PhD explains, "Biological sex is the single most important determinant of athletic performance that is known."¹⁵ Endless sports statistics document the large advantage male athletes have over female athletes.¹⁶

"It makes me feel expendable," said one of the girls displaced by a boy in track in 2025. "The adults are supposed to make guys run in their category, but the adults in power aren't trying to do anything. If anything, they're trying to let more guys in our race." Her mom added, "The media is always talking about boys' feelings and their mental health. What about girls' feelings and their mental health?"¹⁷

Amicus Carol Brown knows well the value and importance of female-only sports and fairness in them. Brown is an Olympic medalist in rowing, and a nine-times member of the U.S. National Rowing Team. "When I was competing," Brown notes "we were incensed by doping scandals and how unfair it was that some athletes were

14. Independent Council on Women's Sports ICONS), *Science*, <https://iconswomen.com/science/>.

15. ICONS, *supra*.

16. Boys vs Women, <https://boysvswomen.com/#/>.

17. Sarah Barker, *It Makes Me Feel Expendable*, June 21, 2025, <https://substack.com/@thefemalecategory/p-166473218>.

gaining unfair advantage by taking testosterone and other male steroids. Now, girls and women are constantly dealing with males in their sports, despite the obvious significant testosterone advantage these males have. It's an outrage that must be ended."

As they lose spots in key races, trophies, and records, girls concurrently lose their privacy and dignity in the locker room. Earlier this year, for example, thirteen girls from Emerald Ridge High School in Puyallup approached school officials to object to the presence of two boys in their locker room. The girls were given gender identity handouts and told they must accept the boys' presence. One of the boys is the individual accused of sexually assaulting a female wrestler during a wrestling match, discussed above.¹⁸

2. Jails and Prisons

It is now commonplace for males to be present in female jails and prisons.

Amicus L.C. Robinson, RN, regularly witnessed trans-identifying males being placed in women's housing at King County Jail where she worked for five years. "Staff had documented accounts of sexual intercourse and harassment, voyeurism, and open masturbation by male inmates in female units," Robinson explains, "but the formal complaints I filed, including a petition to King County officials, were rejected and I was instructed by leadership to 'let the women advocate for themselves.'"

18. Brandi Kruse, *Girls forced to wrestle, share locker rooms with biological boys*, Undivided with Brandi Kruse, January 23, 2026, https://www.youtube.com/watch?v=2J__8IhNb98&t=15s.

Without legal or medical documentation, males imprisoned in Washington State facilities may “at any time” formally change their identity and request female housing through the Department of Corrections (DOC) 02-420 Preferences Request form. While DOC policy requires staff to consider predatory behavior and past violence in their housing decisions,¹⁹ this has not prevented the transfer of males with convictions which include: 1st and 2nd degree child rape, 1st degree child molestation, 1st degree kidnapping, sexual exploitation of minors, murder, and man-slaughter. As of 2023, there were eleven known male inmates in Washington State’s female prison (WCCW).²⁰

Male inmates share cells, bedrooms, bathrooms, and showers with female inmates. They may be in the top bunk as a woman attempts to sleep below. In other words, incarcerated women are forced to be with men in confined spaces, and in states of vulnerability like being undressed,

19. Washington State Department of Corrections, *Employee manual for the identification, treatment, and correctional management of transgender, intersex, and non-binary individuals*. (Aug. 15, 2023), <https://doc.wa.gov/sites/default/files/2025-02/600-GU009.pdf>.

Washington State Department of Corrections, *Non-discrimination for individuals*, <https://doc.wa.gov/sites/default/files/data/files/100500.pdf> (July 17, 2023).

Washington State Department of Corrections, *Transgender, intersex, and/or non-binary individuals*, Aug. 17, 2023, <https://doc.wa.gov/sites/default/files/data/files/490700.pdf>.

20. Caroline Downey, *Meet the trans-identifying male felons of the Washington State women’s prison*, National Review, July 30, 2024, <https://www.nationalreview.com/news/meet-the-trans-identifying-male-felons-of-the-washingtons-womens-prison/>.

sleeping or toileting. They cannot remove themselves because they are literally locked in with the men.

Most women would be distressed by those circumstances. As noted earlier, males generally can easily overpower women, and most sexual assault is perpetrated by males against females. Young women risk being impregnated by their rapists, and over 70% of women in state and federal detention facilities are under 45 years old.²¹

For incarcerated women the loss of female-only housing is especially traumatic. Nearly all of them have suffered abuse at the hands of men.²² Feeling unsafe dramatically undermines their ability to heal and rehabilitate.

In Washington State and across the United States, trans-identifying males housed in female prisons are disproportionately guilty of violent crimes and/or sexual assault. The most common reason for incarceration of trans-identified males is sex offenses.²³ At least 5 of the

21. E. Ann Carson & Rich Kluckow, *Prisoners in 2022 – statistical tables.*, Bureau of Justice Statistics, November 2023, <https://bjs.ojp.gov/library/publications/prisoners-2022-statistical-tables>.

22. National PREA Resource Center, *86 percent of women in jail are sexual-violence survivors*, Nov. 11, 2017, <https://www.prearesourcecenter.org/resource/86-percent-women-jail-are-sexual-violence-survivors>.

Storm Ervin et al., *Addressing Trauma and Victimization in Women's Prisons*, Urban Institute, October 2020 (updated April 2021), <https://www.urban.org/research/publication/addressing-trauma-and-victimization-womens-prisons>.

23. Bureau of Prisons, *Transgender Offense Stats* (2023), https://x.com/NoXY_USA/status/1695205078376845782/photo/2.

11 known male inmates at WCCW as of 2023 were sex offenders, and a sixth was a serial killer of prostituted women.²⁴

In 2024 and early 2025, 51 female prisoners at WCCW submitted formal complaints to the Washington Department of Corrections about the negative impact of being housed with male inmates. Amicus E.H. Reumann has heard from scores of these women about their experiences of being stalked, harassed, and even physically assaulted by male inmates. Some said that the mere presence of male inmates triggers trauma responses. One woman quoted to Reumann from the complaint she had filed with DOC: “I am speaking up about my ongoing and increasing fear of being forced to live in rooms with males here (a situation that instantly triggers my PTSD). I am not comfortable with rooming with males—in fact I’m terrified.” She described how being housed with a male affected her: “my body went into PTSD mode when [the male] was in my room—terrified, shaking violently inside, racing heart, irregular heart rhythms.”

Washington state has failed to address the women’s grievances or change its housing policies. On April 27, 2026, a lawsuit was filed on behalf of women incarcerated at WCCW stating that they have been “physically assaulted, threatened, intimidated, or sexually harassed by male

Shan Jumper, *Transgender criminology in the United States*. The Prison Journal (2026), <https://journals.sagepub.com/doi/abs/10.1177/00328855251396460>.

24. Downey, *supra*.

inmates housed with them in the prison designated for females.”²⁵

In the lawsuit, named plaintiff Inmate Faith Booher-Smith describes being brutally assaulted by a six-foot-four male inmate, as a female guard failed to intervene out of fear for her own safety. Booher-Smith received a host of injuries, and since the attack has suffered from “heightened anxiety.” At least three trans-identifying male inmates are in her immediate living environment at the prison, and one has made an intimidating remark to her. The same inmate accused of attacking Booher-Smith has been sued by another female inmate who was forced to share a cell with him. That woman says the man “masturbated in front of her, groped her while she slept, and repeatedly threatened her with rape.”

3. Pools, Bathrooms, Shelters, and Every Other Formerly Female-Only Space

Everywhere Amici turn, they find males in what were once female-only places. Loss of the spa is part of a ubiquitous evisceration of their boundaries, privacy, and sex-based rights.

25. *FAIR & Faith Booher-Smith v. WA Dept. of Corrections & Tim Lang*, Case 2:26-cv-01419, Complaint For Compensatory Damages and Injunctive Relief; US District Court Western District of Washington State, April 27, 2026, https://www.americafirstpolicy.com/assets/uploads/files/AFPI_WDOC_Complaint_04.27.26.pdf.

Amicus Julie Jaman found a male in the women's locker room at the YMCA pool in Port Townsend and when she objected she was banned from the Y for life.²⁶

Amicus Diana Gruszynski, once a user of Seattle's public pools, stopped using them after WSHRC rules allowed males in female spaces. She read about men in the women's locker rooms at local pools²⁷ and never went back.

Emergency shelters place males who claim to be women in female-only overnight dormitories.²⁸ Amicus Alex Myrick, MSW, a former clinical supervisor of a Crisis Respite Program at the Downtown Emergency Service Center in Seattle described what happened when a trans-identifying male was put in the women's dormitory: "One of our female clients was awakened by our new client masturbating in her face, with his intact male genitalia. This vulnerable woman who had experienced substantial trauma was retraumatized and had a substantial setback to her stabilization."

26. Denise Whitaker, *Woman, 80, banned from YMCA pool after clash with trans woman in locker room*, KOMO TV, Aug. 12, 2022, <https://katv.com/news/nation-world/woman-80-banned-from-ymca-pool-after-clash-over-trans-woman-in-locker-room-washington-state-mountain-view-pool-port-townsend-controversy-alleged-code-of-conduct-violations>.

27. Komo Staff, *Man found in women's locker room cites new transgender bathroom rule*, KOMO News, Feb. 18, 2016, <https://komonews.com/news/local/man-found-in-womens-locker-room-cites-new-transgender-bathroom-rule>.

28. MRSC, *New Rules Addressing Use of Gender-Segregated Facilities*, Jan. 14, 2016, <https://mrsc.org/stay-informed/mrsc-insight/january-2016/new-rules-addressing-use-of-gender-segregated-faci>.

Many Amici experience the loss of the female-only spa in the context of losing other female-only spaces vital to their health and happiness. One of the Amici, for example, treasured an annual “sacred female” retreat for decades, but then trans-identifying men were admitted because of the WLAD. Rites of passage honoring biological life phases unique to females had been attended only by women, but now men were present. Survivors of sexual abuse had an especially hard time with this. Their objections rebuffed and the express purpose of their gathering subverted, the Amicus Curiae and other women had no choice but to leave.²⁹

Amici encounter males in public bathrooms, on female-only social media apps, and in support groups for female-only medical conditions.

C. THOSE WHO OBJECT TO THE EVISCERATION OF WOMEN’S RIGHTS ARE SYSTEMATICALLY SILENCED.

Whenever a woman fails to agree that a trans-identifying man is a woman, she risks severe punishment. Women may be fired from their jobs, disinvited from speaking at public events, summarily expelled from organizations, kicked off social media platforms, presented with no-contact letters from loved ones, and shunned by former friends.³⁰ Girls who object to males in their sports

29. Mara Lake, *The Undoing of a Unique Sisterhood in Female Erasure* 379-392 (Ruth Barrett, ed., 2016).

30. Carol Dansereau, *Hitchhiker’s Guide (Part IV): Other Tactics & Who’s Behind Gender Identity’s Rapid Ascent*, section on Suppression, May 2022, <https://caroldansereau.substack.com/p/hitchhikers-guide-part-iv-other-tactics>.

and locker rooms may be investigated for “bullying” and “harassment.” Julie Jaman can never swim at the Y again because she objected to a man in her locker room. Any woman who objects to the trampling of her rights potentially faces WSHRC investigations and fines.

Many of the Amici have been surrounded by frightening mobs that made deafening noise, pushed into them, and otherwise attacked them, as the Amici attempted to speak in public forums about these issues.³¹ Many of the Amici have been threatened and harassed as they entered or exited events where speakers challenged gender ideology.³²

As women are silenced, the tenets of gender identity ideology are promoted all around them. Major news outlets like the Seattle Times use language that endorses that ideology and fail to interview those defending women’s rights.³³ Reporters who write stories that might encourage some readers to question gender identity policies

31. Carol Dansereau, *Aggressive, Shrieking, Drowning Us Out*. Aug. 16, 2022, <https://caroldansereau.substack.com/p/aggressive-shrieking-drowning-us>.

Let Women Speak, Video of man trying to attack woman shortly before mob forced women speaking for women’s sex-based rights out of a park in Tacoma, WA, October 2022, <https://x.com/StandingforXX/status/1585352747528122369>.

32. Jess Grant, *The Left isn’t Right. It’s Wrong*, May 30, 2025, <https://jessgrant1.substack.com/p/the-left-isnt-right-its-wrong>.

33. Ryan Nguyen, *Supreme Court trans athlete ruling: What it means for Washington*, Seattle Times, June 30, 2026, <https://www.seattletimes.com/education-lab/supreme-court-trans-athlete-ruling-what-it-means-for-wa/>.

cannot get those stories published.³⁴ Schoolchildren are aggressively taught that sex is a matter of self-declaration and anyone who disagrees is bad.³⁵

D. THE LEGAL FRAMEWORK USED TO DISEMPOWER WOMEN IS IRRATIONAL, INTERNALLY INCONSISTENT, AND THE RESULT OF ANTI-DEMOCRATIC BAIT-AND-SWITCH TACTICS.

In 2006, the Washington State legislature amended the WLAD to prohibit discrimination based on sexual orientation. Public discussion at the time focused on homosexuals without mentioning implications related to trans-identifying individuals.³⁶ Only later during implementation of the law did a focus on people who believe themselves to be the opposite sex emerge.

34. Matt Calkins, *I was a sports columnist at the Seattle Times for 11 years. This is why I resigned*, Aug. 20, 2026, https://mattycee.substack.com/p/i-was-a-sports-columnist-at-the-seattle?utm_source=post-email-title&publication_id=10563175&post_id=212028578&utm_campaign=email-post-title&isFreemail=false&r=42vj42&triedRedirect=true&utm_medium=email.

35. Carol Dansereau, *The Anti-Science Disaster of Gender Ideology in the Schools*, Dec. 10, 2022, <https://caroldansereau.substack.com/p/the-anti-science-disaster-of-gender>.

36. Washington State Legislature, House Bill Report ESHB 2661, 2006, <https://lawfilesexst.leg.wa.gov/biennium/2005-06/Pdf/Bill%20Reports/House/2661.HBR.pdf>.

TWS.org, *Legislative Week in Review*, January 17, 2006, <https://tvw.org/video/legislative-week-in-review-2006011273/>.

A strategy document³⁷ prepared for the transgender lobby reveals that this bait-and-switch approach was standard for gender identity ideologues. “Tie your campaign to more popular reform,” the document advises, pointing to groups that pushed through transgender policies concurrent with marriage equality legislation. “This provided a veil of protection” the document explains because marriage equality was popular whereas granting men the ability to enter female spaces was not. “Avoid excessive press coverage and exposure,” the document recommends. “[M]any believe that public campaigning has been detrimental to progress” for the trans activists’ agenda.³⁸

As the WSHRC began to focus on gender identity, it made a thoroughly illogical leap. It conflated objecting to trans-identifying males in female spaces with discrimination against those males. Those who believe in gender identity ideology were empowered to impose their “sex self-ID” beliefs on others. If a person says they’re the opposite sex, everyone must agree, forfeiting sex-based rights accordingly. The WSHRC adopted rules that explicitly give trans-identifying individuals access to opposite sex spaces, like restrooms, locker rooms, dressing rooms, and shelters.³⁹ It declared that “In such facilities where undressing in the presence of others occurs, covered entities shall allow access to and use of a

37. Dentons et al., *Only Adults? Good Practices in Legal Gender Recognition for Youth*, Nov. 2019, https://www.trust.org/wp-content/uploads/2024/09/downloaded_file-69.pdf.

38. Dentons, *supra*.

39. Wash. Admin. Code § 162-32.

facility consistent with that individual's gender expression or gender identity.”⁴⁰

Washington State's efforts to end discrimination against gay people morphed into declaring that women have no right to women-only spaces and sports. This made no sense and was not in keeping with what people thought was being passed in 2006.

When the WSHRC enforces the WLAD's prohibition on discrimination based on creed, it doesn't require people to adopt the tenets of an individual's religious beliefs. Yet it insists that people must treat core tenets of gender identity ideology as true. They must agree that some men are women, and forfeit female-only spaces. They must embrace sexist stereotypes they fought throughout their lives, nodding agreeably when a man cites those stereotypes as evidence of his womanhood.

This imposition of the tenets of gender identity ideology is at odds with a specific declaration in the WLAD that “This chapter shall not be construed to endorse any specific belief, practice, behavior, or orientation.”⁴¹

Trans-identifying males are excluded from the Olympus Spa and other female-only spaces not because they are trans-identifying, but because they are male. Using the illogic of the WSHRC, the spa could be sued by a black man for discrimination based on race, when its exclusion of him would be based not on his race, but on his sex.

40. Wash. Admin. Code § 162-32-060.

41. RCW 49.60.020.

The Spa and other female-only spaces do admit females who claim to be men, i.e., trans-identifying females. Sex segregation policies exclude on the basis of sex, not identity.

The lower Court declared the statutory language on gender identity “unambiguous.”⁴² It could see no other possible interpretation beyond requiring everyone to agree that trans-identifying men are women entitled to disregard women’s sex-based rights. This reveals significant bias on the part of the Ninth Circuit in favor of gender identity ideology. A more rational interpretation of the statute is that the spa can’t exclude women who claim to be men, based on the trans identities of those women.

Bias is also apparent in the Court’s use of the term “cisgender,” its reference to a male as “she,” and its use of phrases like “any woman, except a trans woman.”⁴³ These language choices reveal that the lower Court believes “trans women are women,” a core tenet of gender identity ideology, that is not shared by Amici or by a majority of Americans.⁴⁴

Which males can use gender identity to gain access to female spaces? Looking at statutory and regulatory

42. *Olympus Spa v. Armstrong*, 138 F. 4th 1204, 1214 (9th Cir. 2025).

43. *Id.* at pp 23-24.

44. Kim Parker et al., *American’s Complex Views on Gender Identity and Transgender Issues*, Pew Research Center, June 28, 2022, <https://www.pewresearch.org/social-trends/2022/06/28/americans-complex-views-on-gender-identity-and-transgender-issues/>.

definitions and WSHRC’s pronouncements, the real question is which males *don’t* have that ability.

The WLAD definition for “gender identity” boils down to “having or being perceived as having a gender identity.”⁴⁵ The term “gender identity” is never actually defined.

The WSHRC Guide refers to “transgender” individuals as people “who experience and/or express their gender [an undefined term] differently from what most people expect.” It says that “gender identity and expression also includes males and females who do not express their gender in stereotypically masculine or feminine ways, such as through their appearance or mannerisms.”

These statements are vague and expansive. All sorts of people defy sexist stereotypes. Apparently, they are all eligible to disregard sex-based rights in Washington State.

It is vital for the Court to understand that there is no physical distinction between people who identify as transgender and others. The vast majority of trans-identifying people were born with typical male or female anatomy. Gender identities are based on feelings, thoughts, and beliefs, and not on any physical differences or anomalies. There is no brain, blood, or other objective test that distinguishes people who say they’re trans, from people who don’t.⁴⁶

45. RCW 49.60.040 (29).

46. Society for Evidence Based Gender Medicine, *False Assumptions Behind Youth Gender Transitions*, December 30,

The WSHRC states that “[b]eing transgender is not dependent upon physical appearance or medical procedures.” It makes it clear that there is no longevity requirement for trans identification by stating that “[a] person can call themselves transgender the moment they realize that their gender identity is different” from their sex.⁴⁷

Trans identification is often discussed in mystical terms. Individuals are said to have been born in bodies with sex organs that don’t align with their “gender identity.” Non-alignment of sexual organs with what a person feels, likes, and wears is redolent of the sexist stereotypes many Amici have spent lifetimes fighting.

Trans identification correlates heavily with prior mental illness, autism, homosexuality, and a history of trauma including sexual trauma.⁴⁸ A majority of trans-identifying children desist from their identifications if

2022, <https://segm.org/false-assumptions-gender-affirmation-minors>.

47. WA State Human Rights Commission, *Guide to Sexual Orientation and Gender Identity and The Washington State Law Against Discrimination*, 11/19/2024. Emphasis added, https://www.hum.wa.gov/sites/default/files/public/publications/20241119_SO%20GI%20Guide.pdf.

48. U.S. Dept. of Health and Human Services, *Treatment for Pediatric Gender Dysphoria. Review of Evidence and Best Practices*, at 248, 256, (Nov. 19, 2025), <https://opa.hhs.gov/sites/default/files/2026-06/gender-dysphoria-report.pdf>.

Carol Dansereau, *Affirming Trans Identities is Harmful*, June 19, 2024, <https://caroldansereau.substack.com/p/affirming-trans-identities-is-harmful>.

they are not medicalized.⁴⁹ Large numbers of transitioned people “detransition.”⁵⁰

In other words, there are lots of non-mystical explanations for trans identities, and those identities frequently are temporary. Nonetheless, discrimination law is being used to give any man who says he’s a woman immediate indisputable permission to disregard women’s boundaries and rights.

Any man whatsoever can say “I am a woman,” and his ticket into women’s spaces is instantly written. Women who object are punished. This is an absurd situation even without considering abusive and predatory men who can use trans identification to gain easy access to women.

There is a clear conflict between trampling women’s rights in the name of so-called “trans rights” on the one hand, and other statutory mandates to defend women’s rights on the other. The WSHRC itself is supposed to treat women as a protected class. And RCW 49.60.400 (4) explicitly states that the ban on preferential treatment based on sex “does not affect any otherwise lawful classification that: a) Is based on sex and is necessary for

49. James Cantor, *Do trans-kids stay trans- when they grow u?p*, Sexology Today, Jan. 11, 2016, http://www.sexologytoday.org/2016/01/do-trans-kids-stay-trans-when-they-grow_99.html.

50. Society for Evidence-based Gender Medicine (SEGM), *Detransition: A Real and Growing Phenomenon*, May 30, 2021, https://segm.org/first_large_study_of_detransitioners.

Benjamin Ryan, *List of lawsuits brought by detransitioners*, Jan. 30, 2026, https://x.com/benryanwriter/status/2017471549536661927/?utm_source=substack&utm_medium=email.

sexual privacy or medical or psychological treatment” or that “(c) Provides for separate athletic teams for each sex.” Findings cited in the WLAD⁵¹ stress the importance of advancing women’s rights and Washington State’s historical commitment to that. The WSHRC’s de facto elimination of female-only spaces and sports is directly at odds with the spirit and plain language of the WLAD and other state laws. It is also at odds with federal statutes like Title IX.⁵² In fact, Washington’s education agency is under federal investigation for violations of Title IX.⁵³

In summary, dismantling women’s rights in the name of fighting gender identity discrimination is the result of bait and switch tactics; irrational conflation of sex-based rights with discrimination against trans-identifying individuals; and vague, circular, manipulable definitions. It is at odds with state and federal mandates including those contained within the WLAD itself.

E. WHERE THINGS STAND

Girls and women in Washington State are deeply harmed by trans-identifying men being treated as women.

51. RCW49.60.500.

52. Title IX, Education Amendments of 1972, 20 U.S.C. §§ 1681–1688 (1972), <https://www.justice.gov/crt/title-ix-education-amendments-1972>.

53. U.S. Dept. of Education, *Title IX Special Investigations Team Launches Directed Investigation into Washington State Superintendent’s Office*, April 20, 2025, <https://www.ed.gov/about/news/press-release/title-ix-special-investigations-team-launches-directed-investigation-washington-state-superintendents-office-0>.

They've lost beloved places of healing and female solidarity like the Olympus Spa and so much more.

It would be bad enough if men in women's spaces, sports and organizations were a rare thing. Even one man can destroy women's peace of mind, the fairness of women's playing fields, and more.

But what women are experiencing is not rare. The destruction of their rights is ubiquitous. It is accomplished under the false guise of ending discrimination against trans-identifying males, a smokescreen made possible by bait-and-switch tactics, irrational declarations about what counts as discrimination, and outrageously manipulable definitions. If a woman accurately notes that a man in her female-only space is a man, that is deemed "discriminatory," "hateful," "transphobic," and even "violent." Misleading statistics are then circulated based on these sorts of incidents.

Powerful forces have fostered the myth that those defending the rights of girls and women are somehow marginalizing and harming trans-identifying individuals, but the opposite is true. It is the defenders of women's rights who are marginalized and under constant attack.

In the name of sex self-ID, women have endured a broadside attack on everything they won through centuries of struggle. A wrecking ball has been taken to their spaces, sports, organizations and lives. The harm experienced by each *Amicus Curiae* is massive and painful. Their collective loss is inestimable.

Amicus Carol Dansereau reflects the anger and resolve of the Amici as they approach the Court on this issue: “We, the descendants of Susan B. Anthony, Elizabeth Cady Stanton, and Sojourner Truth, strenuously object to the erasure of our rights. We strenuously object to the suppression of our voices and the Orwellian use of noble concepts like fighting discrimination to return girls and women to the oppressed status we fought so hard to escape.”

CONCLUSION

Amici respectfully urge the Court to bear in mind the huge ramifications of this case for girls and women. As the Court makes its decision, Amici implore it to act in a manner that will not further undermine the rights of girls and women. The Court should only grant certiorari if its review can address serious problems with the WSHRC’s interpretation of discrimination law and the resulting harm to the female sex class. Amici also urge the Court to acknowledge and address obvious bias in favor of gender identity ideology evident in the Ninth Circuit’s opinion.

September 30, 2026

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APPENDIX

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