IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA Tallahassee Division

AUGUST DEKKER, legally known as)	
KORI DEKKER; BRIT ROTHSTEIN;)	
SUSAN DOE, a minor, by and through)	Civil Action No.
her parents and next friends, JANE)	4:22-cv-00325-RH-MAF
DOE and JOHN DOE; and K.F., a)	
minor, by and through his parent and)	
next friend, JADE LADUE,)	
)	
Plaintiffs,)	
V.)	
)	
SIMONE MARSTILLER, in her)	
official capacity as Secretary of the)	
Florida Agency for Health Care)	
Administration; and FLORIDA)	
AGENCY FOR HEALTH CARE)	
ADMINISTRATION,)	
Defendants.)	
, and the second)	

Declaration of Camille Kiefel In Support of Defendants' Opposition to Plaintiffs' Motion for Preliminary Injunction

I, Camille Kiefel, declare as follows:

1. I am over the age of 18 years and am not a party to this action. I have actual knowledge of the following facts and if called upon to testify to them could and would do so competently. I am submitting this Declaration in support of Defendants' opposition to Plaintiffs' Motion for a Preliminary Injunction and Complaint.

- 2. Florida Administrative Code § 59G-1.050(7), which prohibits Medicaid coverage for medical and surgical interventions meant to "alter primary or secondary sexual characteristics," is a necessary and potentially life-saving regulation that will protect vulnerable young people from physical and mental harm, irreversible physical changes, and deep regret that I have experienced.
- 3. The Florida regulation is particularly important to me in that my surgery was paid for by Medicaid. Had a regulation like Florida's been in place when I sought my surgery, it would have required me to pause before undergoing surgery and perhaps prevented me from the loss of health body parts I now regret.
- 4. I suffered a series of traumatic events while growing up that distorted my view of the sexes. My parents went through a difficult divorce in which my mom was emotionally dysfunctional and spiteful, while my dad was more stable. In fifth or sixth grade, I began to wear girly preteen fashion and my dad told me how men his age talked about girls my age. My dad told me later that he was concerned about me being promiscuous. Then my friend was raped by her brother and the police interviewed me. I found the whole experience traumatic.
- 5. I was diagnosed with ADHD and put on medication to which I reacted poorly. That made me further lose respect for my mom because she had put me on the medication.

- 6. I then began to dress masculine. Previously an avid writer, I developed writer's block. I then focused on Anime.
- 7. In high school, I changed my diet and stopped eating meat. I started to have depression. There is evidence that suggests a meatless diet can contribute to depression.
- 8. In college I was ostracized by the "call out" culture, because in that culture if you are not part of a group then you are worthless.
- 9. I have done all kinds of therapy over the course of 20 years, including talk therapy, hypnotherapy, EMDR (eye movement desensitization and reprocessing), DBT (dialectical behavior therapy), TMS (transcranial magnetic stimulation therapy), Somatic Experiencing, and medications.
 - 10. In 2016, I started seeing a gender therapist and came out as nonbinary.
- 11. I was still dealing with anxiety and depression and in 2020 I was on my second set of TMS, trans-cranial magnetic stimulation, treatments which helped some but not as much as I felt I needed. So, I turned to top surgery for an answer.
- 12. I did not want to be a man or a woman but instead wanted out of all sex types. I had a double mastectomy with nipple grafts in August 2020, not to emulate either sex but to be non-binary.

- 13. I had seen "female to non-binary" "top surgery" on the internet and believed it was an accepted, proven treatment. I did not realize at the time that it is experimental and had discomfort around my breasts due to trauma.
- 14. I received two letters recommending surgery from two mental health professionals at gender clinics one in May 2020 and the second in July 2020. Although I had a number of mental health issues and years of treatment, these providers did not review or ignored my records nor did they do a psychological evaluation even though they acknowledged that I had trauma.
- 15. I developed complications from the surgery. I developed "Raynaud's Syndrome" in which one's capillaries shrink and caused my extremities to get cold and discolored. This caused great discomfort. I also developed a burning sensation in back of my neck, tinnitus (ringing) in my ears, musculoskeletal issues, skin discoloration, most likely bone spurs, and insomnia.
- 16. My suicidal ideation worsened. I became terribly sleep deprived and my anxiety worsened. I became deeply depressed and distraught over time after the surgery. I knew something was going wrong with my body. My mother had to lay down with me to help me sleep. I had many physical problems and made many trips to the ER. The doctors were stymied. My mother talked to me about psychiatric hospitalization.

- 17. Rather than fixing my problems, the surgery made my physical and mental health worse.
- 18. I began to focus on holistic treatments through my own research with the help of a naturopathic doctors, bodywork practitioners, and trained staff certified in functional hyperbaric medicine who did treatments that helped restore balance to my nervous system. The holistic treatments helped me a great deal, and as my physical health improved so did my mental health. I began a slow progression to reconnect with my female body and womanhood.
- 19. I began looking at different information that offered different perspectives than I had received from internet transgender sources.
- 20. I detransitioned in 2022 when, after the effective holistic treatments, I was at peace with the realization that I am a woman.
- 21. I hate that I underwent the surgery. I can never breast feed if I have children. For many years I did not want a family because I felt so poorly physically and mentally. Now I want to marry and have kids. I can't fit clothing the same way again.
- 22. I believed that I was doing everything I was supposed to do. Now I realize that I was having a number of physical and mental health problems that no professionals investigated or addressed before prescribing a treatment that caused me to lose a part of my body.

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23. Surgery is such a drastic, irreversible step. As I experienced, we do not

truly know what these surgeries will do to the body – they are experimental. They

are doing surgeries for a state that does not exist in nature. Those undergoing the

surgeries are putting their bodies at risk and subjecting their bodies to trauma.

24. I am quite concerned that doctors are not running the right lab tests or

doing the right holistic medical assessments to find out what is truly causing gender

dysphoric patients their dysphoria and the desire to surgically remove parts of their

body.

25. I have significant concerns about the experimental nature of the sur-

gery. There is no biological blueprint for the surgery. There are no controlled studies.

As I have experienced, because of the experimental and unpredictable nature of these

surgeries the medical care one receives afterward is abysmal because they don't

know what to do for you. These surgeries should not be funded by tax dollars.

I declare under penalty of perjury that the foregoing is true and corrected.

Executed on October 3, 2022.

<u>/s/ Camille Kiefel</u>
Camille Kiefel

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