

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

JANE DOE, individually and on behalf
of her minor daughter, SUSAN DOE,
et al.,

Plaintiffs,

v.

JOSEPH A. LADAPO, M.D., *in his
official capacity as Florida’s Surgeon
General of the Florida Department of
Health,* et al.,

Defendants.

Case No. 4:23-cv-00114-RH-MAF

**DECLARATION OF REBECCA CRUZ EVIA IN SUPPORT OF
PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

I, Rebecca Cruz Evia, hereby declare and state as follows:

1. I am over the age of 18, of sound mind, and in all respects competent to testify. I have personal knowledge of the information contained in this Declaration and would testify completely to those facts if called to do so.
2. I am 40 years old, and I am a plaintiff in this Action.
3. I am a Florida resident. I live in St. Lucie County.
4. I am a woman and I am also transgender. Although I was incorrectly assigned the sex male at birth, my gender identity is female. I experience and have been diagnosed with gender dysphoria due to the significant distress caused by the

disconnect between my sex assigned at birth, along with some of my primary and secondary sex characteristics, and my gender identity.

5. I have been prescribed estrogen, which has allowed me to bring my body into alignment with my female gender identity. I began receiving hormone therapy at Care Resources in Miami, Florida, and I currently receive my medical care from physicians at the University of Miami Health System.

6. I have legally changed my name and my gender marker on my government-issued identification documents, and am legally recognized as female by the state and federal government.

7. I underwent a breast augmentation procedure in 2020, which further helped to bring my body into alignment with my gender identity.

8. I have experienced significant improvement in my quality of life due to being on hormone therapy and receiving surgery, both of which help to ameliorate some of the effects of my gender dysphoria.

9. I was scheduled to have surgery at the University of Miami on August 15, 2023, with a pre-op consultation scheduled for August 4, 2023. The surgery is a vaginoplasty and it has been deemed medically necessary for the treatment of my gender dysphoria. I meet the criteria under the WPATH standards of care, and I provided the surgeon with two letters attesting to my readiness for surgery, including from my mental health provider.

10. I received a phone call from my surgeon at the University of Miami informing me that my surgery has been cancelled due to SB 254. This news was devastating and shocking, as I am mere weeks away from my scheduled procedure, and I have already made the necessary arrangements to undergo this needed medical procedure.


11. I have sought out other alternatives for receiving the medically necessary procedure, but I have no other options for obtaining this surgery.

12. Without access to the procedure, I will continue to experience harm related to my gender dysphoria. As an adult, I should be able to make decisions about my own health and my own body, but because of SB 254, I am being denied the treatment prescribed for me by my treating medical providers.

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

Executed this 24th day of July, 2023.

Respectfully Submitted,

DocuSigned by:

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Rebecca Cruz Evia