



ADVANCING AMERICAN FREEDOM

September XX, 2025

Andrew N. Ferguson
Chairman of the Federal Trade Commission
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: “Request for Public Comment Regarding “Gender-Affirming Care” for Minors,” [FTC-2025-0264-0001]

Dear Mr. Ferguson:

Advancing American Freedom applauds the Federal Trade Commission’s (FTC) investigation into “Gender Affirming Care” (GAC). From its first days, this administration has demonstrated its commitment to protect young students from gender indoctrination by their schools including when “young men and women are made to question whether they were born in the wrong body and whether to view their parents and their reality as enemies to be blamed.”¹

Filing 12 amicus briefs in parental rights cases regarding school-led social transitions, AAF has seen school districts include LGBTQ groups in their commitments to mental health. Further, the latter groups seem to depend on the findings and suggestions of the World Professional Association for Transgender Health (WPATH), a leading voice for gender health. In a batch of WPATH communications leaked in 2024, WPATH clinicians admitted they perform procedures without informed consent and blatantly misinform their audience of the long-term effects of social transitioning. Therefore, if schools are directing children into WPATH programs or to WPATH aligned therapists, the schools are stained with the same fraudulent behavior.

We urge the FTC to investigate as far as is consistent with the commerce clause the extent to which school districts, operating with federal funding, encourage GAC and create a market of individuals that face life-threatening consequences should they ever choose to discontinue GAC.

The WPATH Disregards Overwhelming Data and Violates Informed Consent

In 2024, WPATH internal messaging including an internal panel was leaked. These communications reveal that the clinicians shaping “gender medicine” knowingly and consistently violate medical ethics and informed consent.

¹ See <https://www.whitehouse.gov/presidential-actions/2025/01/ending-radical-indoctrination-in-k-12-schooling/>

In their panel titled “Identity Evolution Workshop” on May 6, 2022, Dr. Daniel Metzinger, a Canadian endocrinologist, reminded the audience of gender doctors that they are “often explaining these sorts of things to people who haven’t even had biology in high school yet.”² Further, the panelists note young patients often attempt to pick and choose the effects of hormone therapy; that children express desires for a deeper voice without developing facial hair or want to feel more feminine without developing breasts demonstrates they do not understand the biological processes they alter.³ Medical professionals encourage them toward GAC all the same.

Moreover, parents cannot compensate for the child’s knowledge gap since the same doctors do not provide parents with the complete information required for informed consent. WPATH aligned clinicians, as well as some school districts, coax parents into social transition campaigns with assurances that changing names and pronouns is harmless and can be reversed at any time.⁴ Downplaying its importance, these professionals deny social transition is a “medical treatment,” which was even affirmed by the First Circuit in *Foote v. Ludlow*.⁵

Yet, the data overwhelmingly suggests the contrary. Over decades of research, Dutch clinicians report desistance rates—the percentage of minors with gender dysphoria who eventually embrace their natal sex—as ranging “between 61 and 100 percent, with specific percentages as follows in chronological order of publication: 75; 87.5; 100; 95.5; 90; 98; 87.5; 61; 87.7.”⁶

Additionally, the 2022 Interim Cass Report supports these findings: Social transition is not a “neutral act” but rather “it is important to view it as an active intervention because it may have significant effects on the child or young person in terms of their psychological functioning.”⁷ When left alone, the majority of children naturally desist during or after puberty and embrace their biological sex, although many later identify as gay. When encouraged to socially transition, however, children “lock in” their new gender identities.

WPATH clinicians are aware that “affirming a child’s transgender identity and allowing a change of name and pronouns serves to concretize the identity in the young person’s mind, making

² Mia Hughes, “The WPATH Files: Pseudoscientific Surgical and Hormonal Experiments on Children, Adolescents, and Vulnerable Adults,” *Environmental Progress* (March 4, 2024), 184, <https://static1.squarespace.com/static/56a45d683b0be33df885def6/t/6602fa875978a01601858171/1711471262073/WPATH+Report+and+Files111.pdf>.

³ *Id.* at 10

⁴ *Id.* at 40

⁵ *Foote v. Ludlow School Committee*, No. 23-1069 (1st Cir. 2025), 25.

<https://www.courtlistener.com/opinion/10334779/foote-v-ludlow-school-committee/?q=Foote+v.+Ludlow>

⁶ Manhattan Institute amicus brief in *Christin Heaps v. Delaware Valley Regional High School Board of Education*, No. 24-3278, 6-7, <https://storage.courtlistener.com/recap/gov.uscourts.ca3.124030/gov.uscourts.ca3.124030.37.0.pdf> citing James M. Cantor, *Transgender and Gender Diverse Children and Adolescents: Fact-Checking of AAP Policy*, *J. Sex & Marital Therapy* 307, 313 (2019) (collecting 11 studies from 1972 to 2019).

⁷ “The Cass Review: Independent Review of Gender Identity Services for Children and Young People: Interim Report.” 2022, 62, <https://webarchive.nationalarchives.gov.uk/ukgwa/20250310143633/https://cass.independent-review.uk/wp-content/uploads/2022/03/Cass-Review-Interim-Report-Final-Web-Accessible.pdf>.

desistance far less likely.”⁸ Still, they tell parents social transition is harmless and push puberty blockers on children who would likely desist.

GAC Invites Life-Long Harms and Medical Dependencies

Where children do not understand the immediate biological effects of treatment, they certainly do not understand the life-long complications coinciding with GAC. In the same panel while speaking about removing a woman’s ovaries if she is taking testosterone, a panelist said “I simply sort of explain the need to have to supplement, you know, in order to have cardiovascular protection, bone health, good bone health as they get older.”⁹ Then, she says about this cohort of 20 year-olds, “if they ever stop their testosterone, they could be at, um, um, at metabolic risk.”¹⁰

Certain GAC procedures invite life-long risks and medical dependencies on children. Thus, proponents of GAC push children down a path, sometimes using trusted school officials, that is simultaneously profitable for the GAC clinicians, therapists, and pharmacists but destructive to future generations.

An Op-ed in the Christian Post named the pattern “transfliction.”¹¹ In the article, a mother describes how Oregon’s state laws empowered state actors to hide her daughter without her parental rights ever being formally revoked. In Oregon, minors can be placed in foster families without parental consent if they report feeling “emotionally uncomfortable or unsupported.”¹² Gender support groups coached her daughter to make a request nearly identical to other trans-identified youth (as if “reading from a script”), and many stand to benefit financially: foster parents receive stipends, therapists are paid for more sessions, the programs themselves receive funding based on how many youth they serve, and, as mentioned above, trans-youth become system dependent.¹³

Even if beneficiaries are not motivated purely by financial gains, the FTC should still be concerned that GAC creates a market with life-long harms for children.

WPATH Misinformation Is Rampant In Schools

Hearing of a chilling social transition policy adopted by Iowa’s Linn-Mar School Board in 2022, AAF filed an amicus brief in *Parents Defending Education v. Linn-Mar Community School District, et al.* According to the Policy, “[a]ny student in seventh grade or older will have priority of their support plan over their parent/ guardian,” and parents have no right to know about or be

⁸ Mia Hughes, “The WPATH Files,” 39.

⁹ *Id.* at 183

¹⁰ *Id.*

¹¹ Alyssa Johnson, “The trans cult has taken my daughter away from me in Oregon,” *Christian Post: Voices* August 13, 2025, <https://www.christianpost.com/voices/the-trans-cult-has-taken-my-daughter-away-from-me-in-oregon.html>.

¹² *Id.*

¹³ *Id.*

“a part of the meeting” to develop a Gender Support Plan.¹⁴ The school board trusts life-changing identity decisions entirely to seventh graders without notifying parents. Instead, the Policy instructs school staff to deceive parents by hiding the non-biological name and pronouns used while at school: “School staff should ask the student what name and pronouns they would like school officials to use in communications with their family.”¹⁵

At the time, AAF recoiled at what we thought was a disturbing, one-off encroachment on parental rights. Since *Linn-Mar*, AAF has filed 11 briefs in secret social transition cases. The same chilling theme runs through them all: school districts double down on gender ideology while actively deceiving parents, ignoring parental requests when they arise, and often pressuring children with the suicide myth.

In *Heaps v. Delaware*, school officials blatantly misdiagnosed tragic events to promote a social transition. In New Jersey, Christin Heaps’s daughter struggled with anxiety stemming from “the childhood trauma of the death of her mother,” and she had previously been diagnosed with “Attention-Deficit Hyperactivity Disorder (ADHD), high functioning autism, and anxiety.”¹⁶ Yet, high school counselor Miranda Ashley insisted the freshman girl’s anxiety was related to gender confusion and facilitated her social transition from female to male. Ensuring the father remained clueless, school officials used her legal name when in earshot of her father, over the school announcement system so as not to alert her siblings, and even withheld communications from two teachers whom school officials deemed “too close” to the father.

Furthermore, some school officials deceive students by inviting them to clubs where the students can be isolated, indoctrinated, and coerced. In Wellington Middle-High School, the school’s art teacher invited sixth grader C.L., twelve-years-old at the time, to an after-school GSA Art Club Meeting. C.L. was not informed that GSA stands for “Gender and Sexuality Alliance Club” or that instead of art she would be presented with a 90-minute lecture that included the claim students were “likely transgender” if “they were not fully comfortable with their bodies.”¹⁷ Previously never questioning her gender identity, C.L. came out as transgender during the meeting.

Brought in the same case, the GSA Club also taught sixth-grader H.J. that transgender people were more likely to commit suicide. Suffering from suicidal ideation, H.J. concluded she must be transgender. Soon after, H.J. attempted suicide.¹⁸ Yet, “Before going to the GSA meetings, H.J.

¹⁴ Advancing American Freedom amicus brief in *Parents Defending Education v. Linn-Marr Community School District*, No. 22-2927, 8, <https://advancingamericanfreedom.com/aaf-amicus-brief-in-parents-defending-education-v-linn-mar-community-school-district/>.

¹⁵ *Id.* 9

¹⁶ Advancing American Freedom amicus brief in *Christin Heaps v. Delaware Valley Regional High School Board of Education*, No. 24-3278, 3, <https://advancingamericanfreedom.com/aaf-fights-for-parental-rights-in-new-jersey/>.

¹⁷ Advancing American Freedom amicus brief in *Lee v. Poudre School District R-I*, No. 24-1254, 3, <https://advancingamericanfreedom.com/aaf-fights-back-against-radical-gender-ideologists/>.

¹⁸ *Id.* 4

never questioned her gender identity or contemplated suicide.”¹⁹ Compounding the school’s reprehensible conduct, the GSA lecturer “warned the students that it might not be *safe* to tell their parents they are transgender or about the meeting” (emphasis added).²⁰

Even when parents remove their children from such schools, some overzealous ideologues follow them. After a mother’s inquiry about her daughter’s increasing distraction and falling grades, school officials in Skaneateles Central School District assured Mrs. Vitsaxaki that no unusual circumstances existed. Then, learning the school had been socially transitioning her daughter by using masculine names and pronouns, Mrs. Vitsaxaki disenrolled her daughter. Mrs. Vitsaxaki was shocked to learn that school officials continued meeting with her daughter “to discuss gender identity” even after she switched her daughter to online schooling.²¹

The previous stories are only a few examples of schools driving impressionable children into the ravenous teeth of GAC. Where these exist, there are certainly more.

These cases demonstrate a pattern of school officials diagnosing the ordinary experiences of an awkward phase of life as gender dysphoria. Further, the schools facilitate social transitions which “lock in” the child’s new identity and provide “resources,” although neither parents nor AAF know for sure what these entail. We suspect they derive from fraudulent WPATH practices and known misinformation.

AAF Urges FTC to Investigate School Districts and Their Source of Gender Information

We urge the FTC to investigate. Where do clubs resembling the Gender and Sexuality Alliance Club at Wellington Middle-High School (Wellington, Colorado in Poudre School District) or Students Advocating For Equality in Delaware Regional Valley District receive their information on gender dysphoria and treatment? Some of these school districts, as with Delaware Valley Regional High School District, include LGBTQ support groups as part of their mental health initiatives. What kind of therapists do they recommend? What resources do they provide for students but refuse to share with parents?

AAF suspects an investigation into these groups will uncover fraudulent WPATH information that is passed off as harmless, accepted science to children who have yet to take biology. Below, we list school districts that have engaged in this behavior as well as the corresponding legal suits brought by parents. We hope it will provide a rich starting point for an investigation. We know these districts have acted illegally and these cases readily provide facts, contacts, and leads:

¹⁹ *Id.*

²⁰ Petition for Writ of Certiorari in *Lee v. Poudre School District R-I*, No. 24-1254, Appendix A, 5a, https://www.supremecourt.gov/DocketPDF/25/25-89/365653/20250721144143726_Petition.pdf.

²¹ Advancing American Freedom amicus brief in *Vitsaxaki v. Skaneateles Central School District*, No. 25-0952, 5, <https://advancingamericanfreedom.com/aaf-leads-amicus-coalition-defending-the-rights-of-parents-and-children-against-gender-indoctrination/>.

- Wellington Middle-High School in Poudre School District, Colorado (see *Lee v. Poudre School District*)
- Baird Middle School in Ludlow Public Schools, Massachusetts (see *Foote v. Ludlow School Committee*)
- Delaware Valley Regional High School District, New Jersey (see *Christin Heaps v. Delaware Valley Regional High School Board of Education et al.*)
- Skaneateles Central School District, New York (see *Vitsaxaki v. Skaneateles Central School District*)
- Leon County Schools, Florida (see *Littlejohn v. School Board of Leon County*)
- Montgomery County Board of Education, Maryland (see *Mahmoud v. Taylor*)
- Olentangy Local School District, Ohio (see *Parents Defending Education v. Olentangy Local School District Board of Education*)
- Eau Claire School District, Wisconsin (see *Parents Protecting Our Children v. EAU Claire Area School District*)
- Linn-Mar School District, Iowa (see *Parents Defending Education v. Linn-Mar Community School District*)

Even more directly, at least two health centers available to middle and high school students in Seattle Public Schools offer gender affirming care at “no cost.”²² Operated by Seattle-based nonprofit Country Doctor Community Health Centers, some services include “hormone therapy, gender transition medications and referrals for gender transition surgeries.”²³ Worse still, the latter operates inside Seattle Public Schools.

We suspect such an investigation will uncover an appalling pattern: federal funding used to support extracurricular clubs that perpetuate consumer fraud. Children should not be pawns in the culture war. We hope the FTC will protect them from fraudulent GAC practices.

²² Kristina Watrobski, “Crisis in the Classroom: Seattle Public Schools offering ‘gender reaffirming care’ to students at ‘no cost’,” *13 ABC Wham* July 13, 2023, <https://13wham.com/news/nation-world/seattle-school-district-offers-gender-reaffirming-care-to-students-partners-with-nonprofit-that-offers-gender-transition-services-washington-seattle-public-schools-parents-defending-education-transgender-nonbinary>.

²³ *Id.*