

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 NEXT FRIEND AND MOTHER,
HEATHER JACKSON,
Respondent.

On Writs of Certiorari to the United States Courts of
Appeals for the Ninth and Fourth Circuits

**AMICI CURIAE BRIEF OF 31 OLYMPIANS AND
93 OTHER FEMALE ATHLETES, COACHES,
SPORTS OFFICIALS, AND PARENTS OF
FEMALE ATHLETES, IN SUPPORT OF
PETITIONERS**

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INTEREST OF *AMICI CURIAE*¹

Since the founding of this nation, equality has been a constant struggle for various people groups. When the struggle has reached this Court, this Court has consistently been willing to consider how to uphold equal protection, equality of opportunity, and equal rights for all persons in these United States.

In these present cases, the need to protect the equality of women is at issue. Sports is the new playing field, but the ultimate victory sought is for equality. *Amici* are 124 female athletes (including 31 Olympians), coaches, teammates, parents, and relatives of these athletes². These athletes come from many levels of playing – from elementary school to collegiate; from professional to Olympic. No matter their level of accomplishment, their years in their chosen sport, or their age – some minors and some adults – all have been forced to compete against males or to suffer the psychological impact of helplessly watching the forced competition of men against women. Each of the *amici* who have signed on to this brief have a unique story to tell that all weave a common thread essential to this Court's consideration.

¹ In accordance with Rule 37.6, counsel affirms that no counsel for any party authored this brief in whole or in part and that no person or entity other than *amici*, *amici's* family members, or their counsel made a monetary contribution intended to fund the preparation and submission of this brief.

² Athletes, coaches, and family members are identified in the Appendix.

Among the 124 athletes, coaches, and family members are: (i) Martina Navratilova, 59x Grand Slam Champion; (ii) Jennifer Sees, former NCAA track and field athlete, high school track coach, and parent of an NCAA soccer player; (iii) Summer Sanders, Olympic Gold Medalist; (iv) Courtney DeSoto, mother of a high school female athlete; (v) Jill Sterkel, an Olympic swimmer, former world record holder, and former University of Texas head swim coach; (vi) Pam Etem, an Olympian in rowing; (vii) Madisan Debos, current NCAA track athlete; (viii) Laura Wilkinson, an Olympian and World Champion in diving and parent to a daughter; (ix) Donna de Varona, an Olympic Gold Medalist and world record holder; and (x) Evie Edwards, a cyclist and the mother of an elementary-age female cyclist.

Amici demonstrate, through painfully lived experiences, that the situations presented in these cases are not unique. Female athletes across the country, at all levels of sports, stand on the precipice of permanently losing their access to equal opportunity and safety in sports. Based on their biological sex, they are at risk of being pushed aside in law and in life in a permanently damaging and irreversible way.

By bringing their names, their voices, and their personal stories to this Court's attention, *amici* hope to highlight the plea of women and girls across the nation: that this Court affirm their continued right to equal opportunity and to rule clearly that females may not be put at a clear and targeted disadvantage based on their biological sex.

SUMMARY OF ARGUMENT

Amici offer an argument that uniquely supplements the bold defense of females' equal rights. By ruling in favor of West Virginia's and Idaho's laws, this Court can reaffirm that women should not lose their equal opportunity to compete in sports on a level playing field. By affirming the states' right to stand with women and girls, this Court can ensure that females' basic right to be treated equally is still the legal norm in the United States. In order for women and girls to be able to talk frankly about their biology and the impact of their sex in sport and in life, the words "female," "girl," and "woman" are an essential recognition of scientific reality throughout this brief. Accurate language that clearly describes the biological existence of female humans must have priority over language of preferred personal identification. This is the only way to protect the rights, equality, and safety of female athletes.

A growing number of women and girls have been facing the humiliating and damaging experience of being forced to compete against males who identify as transgender in the women's sports category. Lawmakers in several states have passed laws to put a stop to this abusive and discriminatory practice, but these laws face challenges in court. *Amici* ask this Court to allow for the protection of women and girls across the nation. One male competing against women and girls negatively affects every girl he competes against as well as every girl who loses a playing opportunity and every girl who must witness a female athlete being asked to step aside for the

feelings of a male, despite the knowledge that it is unfair to ask her to do so.

Amici's experiences as athletes, coaches, parents, and relatives of female athletes prove that females are uniquely and adversely affected when they are forced to compete against males in sports. Their personal stories demonstrate that females and males cannot experience or compete in physical sports in the same way; that the psychological, tangible, and long-term harm suffered by females forced to compete against males is irreversible; and that females across the nation at all levels of sports are suffering real harm that threatens their right to basic equality, safety, and equal opportunity under the law.

ARGUMENT

I. Females are uniquely and adversely affected when they are forced to compete against males in sports.

It is hard to express the pain, humiliation, frustration, and shame women experience when they are forced to compete against males in sport. It is public shaming and suffering, an exclusion from women's own category – a place that uniquely belongs to them. The message to women and girls, roughly 50% of our population, is shared by the parents, teammates, and spectators who watch it unfold. The shame does not disappear after competition is over. It stays forever as a memory of sanctioned public ridicule and a reminder of how women should expect to be treated and set aside for the needs and desires of males – something we believed our nation had already wrestled with (and

overcome) on other issues such as the right to vote, admission to law school and other higher institutions, and once-rampant discrimination against pregnant women in the workplace.

At every age and every level, a female athlete deserves to know she is worthy of respect and fair competition against other females. She should not have to reach elite status to finally be deemed good enough to play without facing sex discrimination. College women's teams do not play against college men's teams; the high school girls' basketball team does not play against the boys' basketball team. The individual men's and women's state champion in tennis do not play against each other to determine who is the actual champion. The women's Olympic sprint champion does not race the men's champion.

This kind of competition is not allowed because we understand the result would almost always serve to humiliate women. It is not real or fair competition. We know the outcome because the numbers, science, and physical realities predict it with concrete assurance. A far less talented and skilled male will soundly beat a female. With this knowledge, we know the contests would merely be a predetermined public display of the physical differences between males and females. Such competition robs women and girls of a place to be held up in equal value to boys and men. In fact, it solidifies and reinforces that they are not worthy of equal opportunity and recognition. Society understands that it places them in a position where they physically cannot win.

Each stage of a girl's sports development path provides the opportunity to play – from granting her the last spot on the team to the first-place podium. These experiences – which start at a young age – create inspiration, self-confidence, strength, and resilience – things every girl should be able to seek fairly and with equal opportunity to her male counterparts. We know the names of women like Martina Navratilova and Kerri Walsh-Jennings because these pathways and opportunities have been protected for females from a young age to the most competitive levels.

A. Females and males cannot experience or compete in physical sports in the same way.

There is enormous emotional trauma that accompanies women and girls when they are subject to competing against males in their sports opportunities against their will and without a choice. This trauma is grounded in real science and an understanding of our physical world as women; it is not a figment of our imagination. As athletes, coaches, and spectators of sport, we know there is a clear and obvious physical difference between boys and girls. We know the physical development of boys – beginning in utero – results in a performance difference between boys and girls. We see this play out in sports and physical activity at every age and every level.

Physical fitness tests and records for youth sports showcase a measurable performance disparity between males and females at every age. There are 6,500 genetic gene expressions that differ between

males and females³ and are not limited to: height, body mass, skeletal structure, calcium uptake, strength, muscle quality, center of gravity, limb length ratios, cardiovascular performance, and, of course, reproductive influence. The effects of any amount of male puberty and androgenization make those early performance differences explode even further.

The American College of Sports Medicine released an expert consensus statement in September 2023, describing the biological basis of sex differences in athletic performance. Key findings included:

Biological sex is a determinant of athletic performance: adult males are faster, stronger, more powerful than females because of fundamental sex differences in anatomy and physiology dictated by sex chromosomes. ... Adult males are stronger, more powerful, and faster than females of similar age and training status. The sex difference in athletic performance where endurance or muscular power is required is roughly 10-30% depending on the event.

ACSM Releases Expert Consensus Statement: The Biological Basis of Sex Differences in Athletic

³ See Researchers Identify 6,500 Genes That Are Expressed Differently in Men and Women, Weizmann Inst. of Sci., *ScienceDaily* (May 4, 2017), <https://www.sciencedaily.com/releases/2017/05/170504104342.htm>; Moran Gershoni & Shmuel Pietrokovski, The Landscape of Sex-Differential Transcriptome and Its Consequent Selection in Human Adults, 15 *BMC Biology* 7 (2017).

Performance, Am. Coll. of Sports Med. (Sept. 29, 2023) <https://acsm.org/biological-basis-sex-differences-athletic-performance/>.

As athletes, coaches, and parents of female athletes, we know this because we live it. We see and understand that the average age at which male athletes will beat the world records of women is 14-15 years of age. The use, weight, and design of sports equipment such as bikes, balls, bats, javelins, discs, and suits, as well as playing fields and net heights reflect the biological differences between boys and men and girls and women and are designed to optimize the competition for each sex uniquely. At every level, we are aware that less skilled, less determined males beat higher level female athletes because of innate physical difference in the sexes. Physical and developmental differences should not mean that girls and women are less worthy of participating, competing, and winning in sport. Females are half of the world's population and deserve equal opportunities as much as males.

B. The psychological, tangible, and long-term harm suffered by females forced to compete against males is irreversible.

When women and girls are asked to compete against male athletes, they are asked to ignore biological reality – the reality that defines female physical bodies. They are asked to pretend there is no hardship or difference in competing against male

development that began in utero⁴ and resulted in differences in muscle structure, bone structure, response and reaction times, bone density, and finally, reproductive influences, such as monthly cycles and possible pregnancy.

They are asked to ignore almost all their lived experiences as well. This expected disconnection from reality has a very real psychological impact. It tells female athletes, their coaches, and their family members that female bodies don't matter enough to be recognized. This message is received when girls and women are told that rules in their sports don't need to be fair and that female bodies don't need to have equal representation on a playing field. Women's and girls' positions can be taken by a male if he requests to play with females, despite his physical advantages. Women and girls must stand by as boys and men now have a claim to female spaces, in addition to their own full male teams.

The girl who loses her place or her chance to compete must watch a male take a place that was originally designed to be set aside for her. She not only has to deal with a loss; but she must also deal with the psychological trauma that comes from knowing that the loss was not just, fair, or equal; it was an 'extra' spot given to a male – one she had no equal opportunity to compete for. The girls around her

⁴ See Inst. of Med. (U.S.) Comm. on Understanding the Biology of Sex & Gender Differences, *Sex Begins in the Womb, in Exploring the Biological Contributions to Human Health: Does Sex Matter?* 35 (Theresa M. Witzmann & Mary-Lou Pardue eds., Nat'l Acads. Press 2001), <https://www.ncbi.nlm.nih.gov/books/NBK222286/>.

must watch a male supplant a place that was once set aside for women. This is mental torture for them. Women and girls know this means their fair treatment and their equal opportunity are no longer recognized as important. They are not protected or safe in their own sports. The girls competing receive the message that their competition is not important enough to demand integrity and fairness, while they witness firsthand that the males' competition and demands are always enough. The damage this causes is irreversible.

As athletes, coaches, and parents of female athletes, we are left with questions. How are we not seen working and training and striving – only to be beaten by a male who has less objective talent and skill but is able to rely on innate male advantage? How have we come to a place where we no longer have fair and equal opportunities in sports and where females are excluded from our own podiums, our own teams, and our own championships because we are expected to affirm males who wish to have our place? How are we expected to compare ourselves to males who everyone knows are physically stronger and biologically different? Why are women not allowed to have a female champion when there is already a male champion – whose place we could never take? Why does a male get to take a female's place on a team or in a race because it will help him feel better? If the measurement is feelings, why do our feelings not count? Will this Court agree that females no longer have the right to equal opportunities in real competitions? Females are suffering irreversible psychological damage that compounds every day that this unequal treatment continues.

C. Females are suffering real harm that threatens their right to basic equality and equal opportunity.

Women and girls had begun to believe that the measured and known performance gap between males and females did not have to be viewed as a stamp of male superiority, but rather as the understood physiological and biological divergence between equally respected members of society. The sex of female bodies, organized around and along divergent developmental paths, affects every cell and system, from reproduction and muscular development to skeletal and cardiovascular systems.⁵

Females had come to appreciate that these innate differences did not strip them of an expected place of equality and fair treatment. Sport and physical competition is the one public place where males and females have been guaranteed the right to celebrate their entirely independent and incomparable physical limits under laws like Title IX. Now, these same rules are being interpreted to remove women's access to equal protection and equal opportunities.

⁵ See Franck Mauvais-Jarvis, Sex Differences in Energy Metabolism: Natural Selection, Mechanisms and Consequences, 20 *Nat. Rev. Nephrol.* 56 (2024); Inst. of Med. (U.S.) Comm. on Understanding the Biology of Sex & Gender Differences, *Every Cell Has a Sex*, in *Exploring the Biological Contributions to Human Health: Does Sex Matter?* 29 (Theresa M. Wizemann & Mary-Lou Pardue eds., Nat'l Acads. Press 2001), <https://www.ncbi.nlm.nih.gov/books/NBK222291/>.

Women's sports were created and set aside to be a place where 50% of the population could finally be included and seen as worthy of the title, "champion"; where they could be held up as valuable members of schools, teams, and society; where their own physical and athletic accomplishments could be seen and celebrated.

Now, the nation is being told that fair sports for women and girls was a lie. As athletes, coaches, and parents of female athletes, we know that asking women to compare their bodies to male bodies is not a just request. The athletes know the competition is unfair. The coaches, officials, and sports scientists know the competition is unfair. The parents and spectators know the competition is unfair. And we all know exactly why. We even know that many of the male athletes taking our positions and titles were not exceptional male athletes in comparison to other males; they now serve as a reminder that a physically unexceptional male is entitled to showcase physical prowess against women and demand women relinquish their opportunity to compete, their place in the event, their hard-earned title, and even their records. The girls and women must comply; the officials must congratulate; the parents must cheer; and the records must be etched for all to appreciate the reinforced reality that males are entitled to replace and show dominance over females in what was once an equal society.

These policies and actions are violating the spirit of the formation of women's sports and key provisions of federal law like Title IX. People in positions of power are looking for the right words to justify this

deprivation of equal opportunity. As women, we can only think that it is because we are “just women;” and that even our biological reality and existence as women is a debatable concept.

The realization that the laws and rights written to protect women are being used against females and the knowledge that people in power cannot or will not see – even in a publicly visible contest – that females are not being treated with the same respect and honor as men is a message that cuts deep into the psyche of women. The women that have experienced this feel the weight of unequal treatment, the stripping of rights, the loss of rewards, and the erasure of fair and equal representation.

Women feel the weight of the message that female physical bodies are only good enough if they are able to compete with a physical development of biology that does not match their own – and that they can never physically attain. Women see and hear the rule makers and lawmakers argue over the purpose of women’s sports and, indeed, assert that the purpose of female athletes is to make a male athlete feel welcome and honored above the female athletes.

Girls and women hear the message that it is a female’s job to consider our kindness above our demands for fair and equal treatment. Female athletes are told that “there are only a few” male athletes who want to compete against women, and so females must step aside and make room for them. The awards and record boards – originally meant to help girls and women share new possibilities for those of us born female – are rewritten with male

names. Female existence and accomplishment in sports is being erased, name by name. When women compete in races against males and compete on teams with males, females know they are supporting the premise of male dominance; they are supporting the idea that females can only respond with meek compliance when treated as less than men; women and girls are forced to support the erasure of something females were proud of and once esteemed for.

As athletes, coaches, and parents of female athletes, what is our choice? To decline to participate? To give up entirely? Do we not then also give away our rights and our dignity? There is no solution for women and girls without the protection of laws that recognize equal opportunity for females in our own category.

The forced competition against males is dangerous and humiliating. It cannot be fair or equal and yet, girls and women must either walk away from sports opportunities or accept the potential danger and risk to our bodies' physical safety and the humiliation. Frustratingly, the rules and laws written for the expressed purpose of equality have not been enough; states now need to write new laws on top of the old ones to prevent the redefinition of the physical reality of being female.

A question sometimes asked is whether there is a way to make competition fair for women while still including some of the males who wish to participate with women. This is also an insulting proposition. Competition is how human beings find their physical limits. It is an invitation to bring one's absolute

personal best and match it with the personal best of others in a fair and clean contest. Bringing a body forward to compete that is intentionally and artificially hindered is not in the spirit of that ethos. The question the lawmakers and governing bodies of sport are asking as they try to make guidelines to include males is just how much rules must impair male performance and development to be equated to that of women. This argument – this experiment – is not empowering for women; it is damaging to an entire generation of females. It is deeply misogynistic and demeaning. Girls and women are not encumbered male bodies. Girls and women are uniquely and innately female, and females should not have to fight for representation and see only biology that does not compare to their own rewarded.

As athletes, coaches, and parents of female athletes, we are hurt and shamed that people in power do not find female athletes important enough to speak up for. We are left to cry and sink into depression on our own as we embrace our new understanding of girls' and women's place in the world. We are left with the shame of not being able to compete physically with a male who wants our place, the shame that laws have not been enough, the shame of losing while others cheered in a competition with no integrity, the shame of seeing males so easily take over that which was established for us, the shame of having to speak out for something so plainly obvious, and the shame of having been silent, even if just for a moment, while we suffered or watched other women suffer. Not one more girl should go through this. Not one more parent should have to watch their daughter sidelined

for a male who is deemed more important than her fair and equal chance.

The rules and record boards have not been fixed. We are not just haunted by our memories and experiences. We are forced to reckon with a public record that condones and historically celebrates our abuse and marginalization. This cannot be the legacy we leave for women and girls; for millions of human beings who are born female.

II. The Stories of Female Athletes

1. Minna Svärd, Former NCAA Division II Track Athlete

It's been three years since swimmer Lia Thomas (born William) won a national title in the 500-yard freestyle at the NCAA Division I Women's Championships. But he wasn't the first man to take a women's NCAA title.

In 2019, when I was a sophomore at East Texas A&M University, I was relegated to second place in the finals of the NCAA Division II Women's 400-meter hurdles. The video from that event shows me racing in lane 8. In lane 4 is CeCé Telfer of Franklin Pierce University—who competed for that school's men's team in 2016 and 2017 as Craig Telfer. He was ranked 390th among NCAA Division II men at the time. But competing in the female category, CeCé Telfer destroyed the women's field and crossed the finish line almost two seconds before me, becoming the first known transgender-identifying male athlete to win a women's NCAA title.

That made me the first collegiate woman to be told her victory was worth less than a man's feelings. I cried a lot that day—not because I lost, but because of how I lost. I also knew I wasn't the only victim. Every time a male athlete enters a female competition, a woman gets cut from the roster to make room.

Men have enormous athletic advantages over women, which is why women's hurdles are 6 inches shorter than men's. Olympic gold-medal-winning times for men's 400-meter hurdlers are about five seconds faster than for women. That's a difference of about 10% — an eternity in this kind of sport.

In 2019, I was the fastest female 400-meter hurdler at any NCAA Division II school. It's been six years since that honor was stolen from me and given to a man, and I want it back. The official results of past competitions should be corrected to align with reality and respect female accomplishments. Male competitors should be removed, and the rank of affected women increased accordingly. The historical humiliation of women in sports, my humiliation, should not be permanently recognized as valid.



Photo 1: 2019 NCAA Division II Women's 400-meter hurdles. CeCé Telfer stands in the center.

2. Macy Petty, former NCAA volleyball player

While in high school, I competed in club volleyball tournaments across the country with hopes of being recruited to a college volleyball team. At one of these tournaments, with several college recruiters watching, I had to play against a boy in a girls' volleyball tournament. While trying to evaluate our skills, the recruiters instead watched this athlete repeatedly slam the ball in our faces.

Because the girls' volleyball net heights are different from boys', this athlete was competing on a net 7.5 inches shorter than he should have as a male. As an athlete, this was humiliating; as a woman, I was horrified to see a boy so easily steal the right to play

in brackets that were designed specifically to make volleyball safe and competitive for female bodies. I thought this was a mistake everyone could see, and it would never happen again.

3. Stephanie Turner, Women's Fencer

I started fencing at the University of Maryland college club team twelve years ago and became competitive within the United States Fencing Association, the USFA, a year later. I have dedicated a significant portion of my life to this sport because, like thousands of other women, I love it.

Fencing is a combat sport, a martial art of sorts. There are elements of speed, power, reaction time, distance control, footwork and blade work - all attributes affected by sex development. It is demeaning to female fencers to put down a woman's loss to a man as a "skill issue" or that a woman simply needs to work harder.

In April 2025, I took a knee in protest to a man competing in my category, Division 1A Women's Foil. The USFA has over 200 self-declared members who identify as "transgender" and this was hardly the first time I faced fencing a man in a woman's competition. In previous instances, I would wait until the last minute to register for a tournament to see if any known men would register. If they did, I would not sign up. I missed out on numerous regional and national tournaments and important opportunities to advance my fencing. But this time, I had already spent the money on competition fees and new equipment, spent hours training and refurbishing my

equipment, and had traveled in preparation for the tournament. That morning when I found myself on the piste against a male fencer, I stood down

Speaking out on this issue has made me a target for harassment and violence, as well as cost me friends. It took me nearly three years to get up the courage to take a knee at the Cherry Blossom Open. That knee I took in protest was a cry for help and an act of desperation. Women deserve to be treated fairly in sport. We deserve opportunities to train, compete and win in a women's category set aside for women. We deserve this at the lowest levels of sport all the way through elite Olympic competition.



Photos 2 and 3: Stephanie Turner takes a knee in protest, refusing to fence a man.

4. Lauren Miller, Professional Women's Golfer

Ever since a club was placed in my hand at six years-old, I've dreamed of playing professional golf, playing on the Ladies Professional Golf Association (LPGA)

Tour and ultimately winning titles. My aspirations led me to pursue golf wholeheartedly, which allowed me to earn an athletic golf scholarship to Mississippi State University and eventually Southern Methodist University for my COVID-year of eligibility. Five years and two masters later, I was ecstatic to make my childhood dream a reality, and in September of 2023, I began my professional golf career.

My first attempt to qualify for the LPGA Tour fell short, and as a result, in January of 2024, I was playing on a mini professional tour in Florida trying to claw my way up the ranks. Though a win here does not equate to a win on the LPGA Tour, a win at any level in golf is meaningful. It's a sport where the greatest only win ten percent of the time.

I was on the cusp of my first win as a professional – and my first since high school – when I found myself in a sudden-death playoff against a trans-identifying male player, Hailey Davidson. Over the course of the tournament, I saw clearly the natural advantages Davidson was able to utilize (e.g. club-head speed, distance, grip/forearm strength) and frankly, it was infuriating.

After tying the first playoff hole, Davidson beat me on the second hole and claimed the title. This was a tough loss to swallow, but it was a loss that should have never happened had LPGA and USGA legislators chosen to prioritize fairness, integrity, and biological realities over inclusion. At the professional level, the difference between winning and losing is more than just a trophy. I lost out on money and points that could have helped me earn starts on a

bigger professional golf tour. This is certainly not what my six year-old self envisioned professional golf to be. It is time to right this wrong and protect women's sports for this generation and the next.



Photo 4: A male, Hailey Davidson, takes the women's title at NXXT Golf Tournament.

5. Hannah Arensman, professional women's cycling, Cyclocross National Champion

I was born into a family of athletes. Encouraged by my parents and siblings, I competed in sports from a young age, and I followed in my sister's footsteps, climbing the ranks to become an elite cyclocross racer. Over the past few years, I have had to race directly with male cyclists in women's events. As this has become more of a reality, it has become increasingly discouraging to train as hard as I do only

to have to lose to a man with the unfair advantage of an androgenized body that intrinsically gives him an obvious advantage over me, no matter how hard I train.

I have decided to end my cycling career. At my last race at the recent UCI Cyclocross National Championships in the elite women's category in December 2022, I came in 4th place, flanked on either side by male riders awarded 3rd and 5th places. My sister and family sobbed as they watched a man finish in front of me, having witnessed several physical interactions with him throughout the race.

Additionally, it is difficult for me to think about the very real possibility I was overlooked for an international selection on the US team at Cyclocross Worlds in February 2023 because of a male competitor.

Moving forward, I feel for young girls learning to compete and who are growing up in a day when they no longer have a fair chance at being the new record holders and champions in cycling because men want to compete in our division. I have felt deeply angered, disappointed, overlooked, and humiliated that the rule makers of women's sports do not feel it is necessary to protect women's sports to ensure fair competition for women anymore.



Photo 5: Hannah Arensmen misses the podium while a male takes her place.

6. Kendall Lewis, Nevada High School Volleyball Player

I am a high school senior and student-athlete in Washoe County, Nevada. I have been a part of the volleyball program for four years. As a middle blocker, it is my job to block nearly every ball that comes over the net. At times, I have had to block male athletes during volleyball practices as part of my training. This experience showed me that men's swings are stronger, with more powerful kills and serves, higher verticals, and larger blocks that are much harder to hit around. For these reasons, I know it is unsafe and unfair for male athletes to compete in girls' volleyball.

Sadly, I also know how deflating it feels to compete against a teenage boy because I experienced it firsthand during my sophomore and junior years. When I first learned that I would be blocking and hitting against a male opponent in a game, fear ran through my body. I felt discouraged and overshadowed by someone I had never met, simply because I knew my physical abilities could never match the natural advantages he had. He was allowed to take away opportunities from girls, and the adults in charge were too afraid to say no.

It was shameful that my state's leaders were willing to put girls' athletic careers on the line. They created unnecessary danger and stripped away both integrity and opportunity for girls like me.

I'm very relieved that last spring, the Nevada Interscholastic Activities Association (NIAA) listened to our concerns and revised its policy for high school athletics. In my final year of competition, I no longer have to struggle with the fear and stress of facing male opponents. Our state athletic association now protects the female category and ensures that girls like me have access to fair competition and equal opportunities to play.

I've experienced high school sports under both sets of rules: those that uphold girls' rights and those that ignore them. Every girl in America deserves to have her rights respected and protected. These have been guaranteed to us.

7. Russell Belden, parent of high school athlete

I am the father of a high school cross-country and track athlete in Washington state. My daughter had to compete against two male athletes in 2023. One athlete initially competed as a male during his freshman year in high school, but switched to the girls' team after performing poorly. After changing to the girls' team, the boy was named League MVP and helped his school qualify to attend the state competition, which prevented my daughter's school from qualifying.

My daughter has been outspoken about the lack of fairness, and asked school administrators if she could protest by withdrawing from a race and making this small statement about fairness:

Every time a boy races as a girl,
it takes away an opportunity for a girl.

It's one less girl getting a varsity letter.
One less girl getting a medal.
One less girl on a podium.

Boys shouldn't be competing as girls.

So today, I'm sitting out this race to symbolize the
one girl that a boy is taking the place of.

Photo 6: Statement by Russell Belden's daughter.

She was told by her school that she couldn't do so. Instead, the girls from her school chose to run together as a pack at one of their races in silent protest. Most parents and school officials in my state are afraid to speak out about this, citing what happened in Vermont to a school that protested having their sports programs taken away. My daughter's school kept saying the WIAA would take away all sports if they did anything. My daughter and I have both been called names for standing up for fairness in girls' sports. I have been threatened by police (South Whidbey) and removed from places at events for standing up for girls' sports.

8. Jarrod Jacobi, father of high school ski athlete

My daughter lives in a school district where alpine ski racing is a varsity sport. On March 5-7, 2023, the CA/NV Interscholastic Ski & Snowboard Federation (CNISF) state finals for ski athletes occurred at Northstar (Tahoe). Forty-to-50 schools were represented, with about 200 athletes in total. My daughter worked hard all season and qualified to represent her high school that year.

I was riding the chairlift with her when she told me that the overall winner of the slalom race the day before, who placed third in grand slalom later that day, was "trans." My daughter has a kind, supportive heart, but we must consider the young ladies down the line (her included) who were displaced in standings by a biological male. How might they feel? What if a few more biological males compete in the women's division next year, and the year after that,

more? Or she does not qualify for state because she lost out to a biological male; or didn't get a college scholarship for the same reason. These are not hypothetical questions; this is where we are headed unless sane people, not afraid to point out the obvious, speak up and take a stand.

These kids – they are kids – live in the world adults have created. I don't blame the winning athlete; this is a failure at the administrative level and higher. I'll point out the obvious: you ruin women's sports by allowing males to compete in women's sports. Speaking for parents of female athletes, are we just expected to "come to terms" with this? No amount of hormone therapy or re/de-constructive surgery will change the biological, muscular, and skeletal differences between those born with XX and those born with XY chromosomes. The assumption is that when my daughter competes in the women's division, she competes against other biological females. She is not in a co-ed or open division.

It is one thing to read about these things happening in other places; it is quite another to witness it firsthand. This injustice to young women cannot continue anywhere, especially not on my doorstep.

CONCLUSION

Every day that girls' and women's equal opportunity in sports is denied is a day that females suffer irreversible harm and psychological trauma. By allowing the laws passed by Idaho and West Virginia to stand, this Court can reaffirm that females have

not lost their equal opportunity to compete in sports on a level playing field. By affirming states' rights – and constitutional obligations – to stand with girls and women, this Court can ensure that the basic right to be treated equally as a person born female is still the legal norm in the United States.

Respectfully submitted,

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September 19, 2025

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APPENDIX

**LIST OF 124 *AMICI CURIAE* FEMALE
ATHLETES (including 31 Olympians),
COACHES, SPORTS OFFICIALS, AND
WOMEN ATHLETES' FAMILY MEMBERS,
MANY OF WHOM HAVE BEEN FORCED TO
COMPETE AGAINST BIOLOGICAL MALES
AND ALL OF WHOM HAVE SUFFERED THE
PSYCHOLOGICAL DAMAGE FROM
WITNESSING FORCED AND UNEQUAL MALE
DOMINANCE OVER WOMEN IN SPORTS¹**

Catrina Allen*
*World Champion –
professional disc golf*

Diana Anglin-Miller
*NCAA Champion and
cheerleading gym
owner, coach, and
judge*

Hannah Arensman*
Professional cyclist

Allison Arensman*
Professional cyclist

**Sarah Powers
Barnhard**
*Professional volleyball
player, current coach*

Cindy Bater
*Rowing national team
athlete, coach, and
educator*

¹ *Amici* submit this brief solely in their capacities as private citizens. To the extent an *Amicus's* employer, institution, or association is named, it is solely for descriptive purposes and does not constitute endorsement by the employer, institution, or association of the brief or any portion of its content.

* An asterisk by a name indicates that the athlete has personally faced a male in sports competition or is directly related to a woman who has personally faced this.

**Pamela Behrens
Golding**
Olympian

Lauren Belden*
*High school cross-
country and track
athlete*

Russell Belden*
*Father of a high school
cross-country and
track athlete*

Lauren Bondly
*Masters National
Champion – Triathlon*

Marianne Bosco*
Fencing athlete

Bonnie Brandon
*6x All-American
swimmer, University of
Arizona*

Carol Brown
*U.S. Women's Olympic
Rowing Team, 1976,
1980, 1984*

**Mariah Burton
Nelson**
*Former professional
women's basketball
player*

Monika Burzynska*
*NCAA swimmer, Penn
athlete*

Frank Busch
*Former National Team
Director of USA
Swimming; 5-time
Olympic coach*

Paula A. Cabot
*Former Director of
Education & Research,
Women's Sports
Foundation; rugby
player*

Cissy Cochran*
*UGA 2001 Women's
National
Championship swim
team; 2000 U.S.
Olympic Trials
qualifier; U.S. Masters
swimming*

Scott Cochran*
*University of West
 Alabama head football
 coach; 8 national titles
 in college football*

Madisan Debos*
NCAA track athlete

Courtney DeSoto*
*Mother of a female
 high school track
 athlete*

Donna de Varona
*Olympic Gold
 Medalist, World
 Record holder*

Jade Dickens
*USA Powerlifting
 athlete*

Sonni Dyer
*Division I collegiate
 head coach and
 Director of Triathlon,
 Queens University*

Evie Edwards*
*Cyclist, mother of
 elementary age female
 cyclist*

Stephanie Elkins
Olympian – swimming

Wendy Enderle*
*3x Masters Swimming
 World Champion; 9x
 U.S. Masters
 Swimming National
 Champion*

**Patricia Spratlen
 Etem**
*U.S. Women’s Olympic
 Rowing Team, 1980,
 1984*

Kelly Funderburk
*Olympian – artistic
 gymnastics*

Tom Funderburk
*NCAA Champion –
 men’s golf, husband of
 female Olympian*

**Dianna (DeeDee)
 Fussner***
*Pro Masters disc golf
 athlete*

Lori Garrison
*NCAA athlete –
 softball*

Shawna Glazier*
Cyclist, Triathlete

**Meredith Gordon
Remigino**
*Athlete, coach, and
official – track/cross-
country*

Annie Grevers
*U.S. National Team –
swimming*

Angie Griffin*
U.S. Masters swimmer

Jan Harville
*Olympian; Olympic
coach; former NCAA
head coach – rowing*

Rena Hedeman*
*Mother of female
rowing athlete*

**Nancy Hogshead-
Makar**
Olympic Gold Medalist

Sarah Hokom*
*World Champion –
professional disc golf*

Ceci Hopp St. Geme
*National team – track;
NCAA Champion
3000m*

**Vicki Huber-
Rudawsky**
*2x Olympian; 8x
NCAA Champion –
track and cross-
country*

Jen Hucke
*2x NCAA Champion in
volleyball, Stanford*

Jarrood Jacobi*
*Father of a current
high school female ski
athlete*

Rhi Jeffrey
*Olympic Gold Medalist
– swimming*

Lacey John
*Olympic Silver
Medalist, NCAA
Woman of the Year*

Raime Jones*
*NCAA athlete –
 swimming, lost a
 finals spot in Ivy
 League
 Championships to Lia
 Thomas*

Scott Jones*
*Father of female NCAA
 athlete*

**Samantha
 Keddington***
*Former professional
 disc golf athlete;
 missed payout
 qualification by one
 placement won by a
 male; current coach*

Danielle Keen*
*Professional disc golf
 athlete*

Ronda Key*
Disc golf athlete

**Alexandra
 Kleinfehn**
*USA Powerlifting
 athlete*

Holly Kruchoski*
Cyclist

Jess Kruchoski*
*Husband of female
 athlete who competed
 against a male*

Lauren Lackman*
*Former National Team
 member, National
 Champion, and
 professional cyclist*

**Jocelyne
 Lamoureux-
 Davidson**
*Olympic Gold Medalist
 – hockey*

**Monique
 Lamoureux-
 Morando**
*Olympic Gold Medalist
 – hockey*

**Lisa Larsen
 Rainsberger**
*1985 Boston Marathon
 Champion; Former 5-
 mile, 10-mile, and 30k
 American Record
 Holder*

Kendall Lewis*

*Nevada high school
volleyball athlete*

Donna Lopiano

*6x National
Champion, Former AD
University of Texas*

Lisa Marshall

*CEO and head coach –
Multisport Explosion
High Performance
Triathlon Team*

Janel McArdle

*Olympic Silver
Medalist and NCAA
Champion – swimming*

Valerie McClain

*U.S. Women's Olympic
Rowing Team, 1980,
1984*

Riona C. McCormick

Current rowing athlete

Kim McGinnis**Russell**

*International Lacrosse
Coach, USVI Women's
National Team*

Cynthia Millen

*Former NCAA, USA
Swimming, and
International
Paralympic swim
official*

Lauren Miller*

*Current professional
women's golfer, former
collegiate golfer*

Cynthia**Monteleone***

*Masters track athlete,
mother of female track
athlete, both of whom
competed against male
athletes*

Linda Muri

*3x World Champion;
17x National
Champion; Holder –
World Best Time;
Collegiate National
Champion; World
Champion coach –
rowing*

Martina Navratilova

*59x Grand Slam
Tennis Champion*

Sarita Nori*

*Mother of female
rowing athlete*

Mary I. O'Connor

*U.S. Women's Olympic
Rowing Team, 1980*

Jan Palchikoff

*U.S. Women's Olympic
Rowing Team, 1976,
1980*

Connie Paraskevin

*USA Olympian – speed
skating and track
cycling*

Abigail Pearson*

*Mother of two female
athletes who have been
forced to compete
against males*

Macy Petty*

*NCAA athlete –
volleyball*

Keri Phebus Olson

*NCAA Champion –
tennis; mother of
female athlete*

Mary T. Plant

*Olympic Gold Medalist
and world record
holder*

Lori Post*

*Mother of NCAA
female swimmer who
competed against Lia
Thomas*

Dennis Pursley

*5x Olympic coach;
American Swimming
Coaches Association
Hall of Fame*

Joy Rako*

*Former NCAA
Division III track and
field athlete*

Lynn Silliman Reed

*1976 Olympic Bronze
Medalist – rowing*

Kelly Rickon**Mitchell**

*Olympic rowing
athlete, 1980, 1984*

Genoa Rossi

*Current NCAA water
polo athlete, U.S. Jr.
National Team*

Linnea Saltz*
*NCAA track and field
runner; 3x Big Sky
Conference Champion*

Summer Sanders
Olympic Gold Medalist

Alison Santa Ana
*Mother of high school
softball and cross-
country athlete*

Cris Santa Ana
*Father of high school
softball and cross-
country athlete*

**Samantha Santa
Ana**
*High school softball
and cross-country
athlete*

Jennifer Sees
*NCAA pole vaulter,
current high school
track coach; mother to
a signed NCAA soccer
player*

Jennifer Sey
*U.S. National
Champion –
gymnastics*

Jeri Shanteau
*National Champion,
U.S. National Team
member – swimming*

Sharon Shapiro
*NCAA Champion and
U.S. National Team –
women's artistic
gymnastics*

Sandy Shasby*
*Family member of a
female athlete*

DeNee Shepherd*
*Professional disc golf
athlete*

Bre Showers
*NCAA Champion –
artistic gymnastics*

Anne Simpson
NCAA rowing athlete

Bronwyn Sims
*Athlete; girls' and
womens' gymnastics
coach*

Kathy Smith**Connor***

*U.S. National Team
member and mother of
daughter who
competed in the 2022
NCAA Swim
Championships*

Lori Stenstrom

*National Champion;
former American
Record holder; mother
of female athletes*

Steve Stenstrom

*NFL quarterback;
father of female athlete*

Jill Sterkel

*Olympian –
swimming; former
University of Texas
head swim coach*

Tracy Sundlan

*5x Olympic coach,
manager, and
administrator – track
and field*

Minna Svard*

*NCAA Division II
track athlete*

Barry Switzer

*Super Bowl Champion;
NFL and NCAA head
football coach*

Becky Switzer

*Olympic and NCAA
coach – women's
artistic gymnastics*

Maya Tait*

NCAA rowing athlete

Inga Thompson

Olympian – cycling

Alison Townley

*Olympian, 1988, 1992
– rowing*

**Hollister (Holly) W.
Turner**

*Past Associate
Executive Director,
Women's Sports
Foundation*

Stephanie Turner*

Women's fencer

Leanne Venema*

*Mother of female
NCAA swimmer*

Eric Venema*

Father of female NCAA swimmer

Vincent J. Ventura

Coach, 1984 Women's Olympic Single Sculler; U.S. National Team coach, 1979, 1980, 1983-1985, 1988

Diane Vreugdenhil

Olympian – rowing

Kerri Walsh-

Jennings

3x Olympic Gold and Bronze Medalist; 3x FIVB Beach Volleyball World Champion; 2x NCAA Volleyball Champion

Sue Walsh

Olympian – swimming; coach; sports official

Claudia Westholder

NCAA swimmer; mother of female athlete

Max Wettstein

Father of U.S. Olympic skateboard team member

Val Whiting

WNBA National Champion

Laura Wilkinson

Olympian and World Champion – diving; mother of female athlete

Sippy Woodhead

Olympian; World Record holder – swimming

Sara Younger-Merrill

Masters athlete – rowing

Jacqueline Zoch

1976 Olympic Bronze Medalist – rowing