

TRANSGENDER CIVILITY: A PRIMER FOR LAWYERS

by Timothy S. Cordes

Over the past year, I have been asked by several attorneys how to handle “the pronoun problem” with regard to transgender issues. While at first, a question like this can seem to be a gross oversimplification of a complex situation – seeking nothing more than a glib response – I think it actually illustrates a very admirable trait in our profession. As lawyers, we understand that “words have meanings,” and that the language we choose when representing our clients can not only have a profound effect on the outcome of their case, but also that the way in which we speak about issues reflects upon our own professionalism and competence. Often, we as practitioners will encounter clients whose life experience is dramatically different from our own, and a key part of being an effective advocate is understanding our clients’ unique situation and the challenges that face them in their lives. Lawyers who are brave enough to ask a “dumb question” about pronouns are demonstrating that they care about not only civility, but also about filling in the gaps in their knowledge to better serve their clients.

Let me start off by saying that I am not transgender. I am a fairly ordinary, cisgender, middle-aged, heterosexual, married guy. When I represented my first transgender client more than a dozen years ago, I knew enough to know that I knew very little about the subject. I was very much like the attorneys who are asking me about “the pronoun problem” now. I don’t claim at this point to be an expert on the subject, but I have spent a lot of time looking things up. The purpose of this article is to help share some of the things I’ve learned along the way, in the hope that it will help my fellow members of the bar be able to better serve their clients with dignity, civility and professionalism.

Basic Terminology

First, let’s start with some basics. What does “cisgender” mean, and how is that different from “transgender?” Simply put, a person can be described as cisgender when

their subjective sense of their own gender (gender identity) is aligned with the gender they were assigned when they were born. Wikipedia presents a fairly concise and accurate etymology:

Cisgender has its origin in the Latin-derived prefix *cis-*, meaning “on this side of,” which is the opposite of *trans-*, meaning “across from” or “on the other side of.” This usage can be seen in the *cis-trans* distinction in chemistry, the *cis-trans* or complementation test in genetics, in Ciscaucasia (from the Russian perspective), in the ancient Roman term Cisalpine Gaul (*i.e.*, “Gaul on this side of the Alps”), Ciskei and Transkei (separated by the Kei River), and more recently, Cisjordan, as distinguished from Transjordan.¹

For cisgender people, their gender identity conforms not only with the gender they were assigned at birth, but also with their current “gender expression,” or the external manifestations of gender in their daily life such as their name, hairstyle, choice of clothing, pitch of voice and body characteristics. As a rule, transgender people seek to align their gender expression with their gender identity, rather than the sex they were assigned at birth.

Sometimes, it may be difficult to accurately determine the sex of a newborn baby. According to the United Nations Office of the High Commissioner for Human Rights (OHCHR) as many as 1.7 percent of people may be born with intersex traits, which is similar to the percentage of the population who have red hair.² A 2015 fact sheet published by the OHCHR includes this description of the term intersex:

Intersex people are born with sex characteristics (including genitals, gonads and chromosome patterns) that do not fit typical binary notions of male or female bodies. Intersex is an umbrella term used to describe a wide range of natural bodily variations. In some cases, intersex traits are visible at birth while

FEATURE ARTICLE

in others, they are not apparent until puberty. Some chromosomal intersex variations may not be physically apparent at all.³

The American Psychiatric Association (APA) made changes to their definitions related to transgender people when they released the fifth edition of the *Diagnostic and Statistical Manual of Mental Disorders* (DSM-V) in 2013. The DSM-V replaced the diagnostic name "gender identity disorder" from the fourth edition (DSM-IV) with the revised, current diagnosis of "gender dysphoria."⁴ Part of the reason for the change was to remove the stigma associated with labeling a person as "disordered." For someone to be diagnosed with gender dysphoria, there must be a marked difference between their expressed/ experienced gender and the gender others would assign him or her, and it must continue for at least six months. The condition arises when it causes clinically significant distress or impairment in social, occupational or other important areas of functioning.⁵

One defining characteristic for a transgender person is the experience of "transition." Transition is frequently misunderstood as being a one-step surgical procedure that results in someone being immediately re-characterized as having fully "switched" to the opposite sex. Popular culture often reduces the process of transition to someone having undergone a "sex-change operation," when in fact,

surgical intervention may or may not be just one part of a multi-year process of aligning a person's gender expression with their gender identity.

In 1952, Christine Jorgensen became the first widely publicized individual to have undergone sex reassignment surgery – in her case, male to female – which created a worldwide sensation. It is perhaps her case that is mostly responsible for the idea that someone can take an airplane to a doctor in a foreign country and step off the plane as a different gender when they return. In fact, the World Professional Association For Transgender Health (WPATH), an organization originally founded in 1979 "to share research and clinical practice experience"⁶ regarding transgender patients, has published their 7th version of a 120-page "Standards of Care for the Health of Transsexual, Transgender, and Gender-Nonconforming People."⁷ Among the treatments listed by WPATH in their standards of care, genital surgery is only recommended after patients "have lived continuously for at least 12 months in the gender role that is congruent with their gender identity."⁸ Other treatments include "hormone therapy to masculinize or feminize the body," "hair removal through electrolysis, laser treatment, or waxing," "voice and communication therapy to help individuals develop verbal and non-verbal communication skills that facilitate comfort with their gender identity," and various forms of cosmetic surgery, such as tracheal shaving

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JURY TRIALS & UTILIZATION

JURY TRIALS & UTILIZATION JULY 2019

Date Started	Judge	Case Number Case Name	Attorneys	Type of Case	Disposition	Jury Days
07-22-19	Alexander	19-269653-FC People v. Williams*	K. Collins, J. Blanch Michael McCarthy	Murder	Ct. 1 – Guilty Lesser Guilty as Charged all Other Counts	6
07-22-19	Alexander	19-269652-FC People v. Brown-Gray*	K. Collins, J. Blanch Stephanie Carson	Murder	Defendant Pled During Trial	0
07-01-19	Anderson	17-157630-CB Kelly Services v. Iron Mountain	Rick Patterson Evan Burkholder	Business Claim	No Cause	5
07-22-19	Anderson	18-268956-FC People v. Miguel	Heather Brown Brian Prain	Criminal Sexual Conduct	Guilty as Charged	3
07-22-19	Bowman	18-267850-FH People v. Baldwin	Sarah Greene Evan Callanan	Criminal Sexual Conduct	Guilty on All Counts	4.5
07-11-19	Chabot	18-267401-FH People v. Brooks	Darcy Jacobs Arnold Weiner	Controlled Substance	Guilty Lesser	2
07-23-19	Grant	19-269900-FH People v. Bearden	Jacob Stamell Jonathan Jones	Criminal Sexual Conduct	Guilty on All Counts	2.5
07-11-19	Kumar	18-269236-FH People v. White	Lauren Benninger Michael Boyle	OWI	Guilty on All Counts	3
07-11-19	Matthews	19-269556-FH People v. Wallace	Stephen Frey Paulette Loftin	Home Invasion	Cts. 1,4 & 9 – Not Guilty Cts. 2,3 & 5-8 – Guilty as Charged	3
07-15-19	Matthews	18-269345-FC People v. Johnson	David Hutson Scott Kozak	Homicide	Guilty Lesser	5
07-29-19	McMillen	18-265592-FC People v. Orasco	Jacob Stamell Lisa Dwyer	Criminal Sexual Conduct	Hung Jury	4.5

* Cases tried together

to reduce the prominence of the “Adam’s apple,” body contouring, breast removal or implants, or facial masculinization/feminization.

Because every person is different, not every medical or surgical intervention will be safe or appropriate for any given transgender individual. Because of this, it is not really possible to try to neatly separate people into “pre-operative” or “post-operative” categories. The internet has allowed many transgender individuals to record and share their personal transition experiences, either through website blogs (www.transsexual.org), or YouTube videos.

Things to be Careful About

It is important that attorneys working with transgender clients avoid assuming anything about their sexual orientation. Just like anyone else, a transman or transwoman can be attracted to one gender or another, and a transwoman who is attracted to women might identify herself as a lesbian, while another who prefers men might see herself as “straight.” Don’t presume that someone’s sexual attraction to one gender or the other has anything to do with the sex they were assigned at birth.

Another area that can be contentious is asking about

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the name that a transgender person used before their transition. While this is often a necessary piece of information for attorneys helping clients with their legal problems, practitioners should be aware that referring to someone by their “deadname” can be fraught with negative emotional baggage for transgender people. Explaining to clients in a straightforward way why this information is necessary for their case can help demonstrate sensitivity to their feelings while allaying any fears they might have that they would be thoughtlessly “outed” by a lawyer who didn’t understand the emotional impact that this can have for some people.

Similarly, attorneys should be careful to avoid “mis-gendering” their clients – even unintentionally. Everybody makes mistakes, but this is an important point because many transgender people have dealt with aggression and hostility from others who refer to them by the wrong gender for much of their lives. Think of the schoolyard bully who taunts someone for “throwing like a girl,” or the mean girls who criticize others for not being “ladylike,” and then imagine how that might affect someone who has felt uncomfortable with their gender identity for their whole childhood. When it is an honest mistake, it is important to apologize and take ownership of the responsibility to try harder in the future. Recognize that it is not their obligation to help you feel better about having made the mistake.


Finally, it is important to not confuse transgender with transvestitism or “cross-dressing.” Both of these terms have a strong connotation with sexual fetishes and paraphilia, and while part of a person’s transition may include wearing clothing associated with the opposite sex, the association with engaging in such activities for sexual gratification is generally seen as very demeaning for transgender people. While history provides several examples of non-sexual cross-dressing, such as professional “drag” performers and participants in certain religious ceremonies, the term “transvestite” is often seen as derogatory in today’s culture.


What Transgender People Say About Themselves

The 2015 U.S. Transgender Survey (USTS)⁹ is the largest survey examining the experiences of transgender people in the United States, with 27,715 respondents nationwide. The USTS was conducted by the National Center for Transgender Equality in the summer of 2015. Of the USTS respondents, 894 were Michigan residents. The table below shows the percentage of respondents who used the following terms to identify themselves:

Transgender	65%
Trans	56%
Trans woman (MTF, male to female)	32%
Trans man (FTM, female to male)	31%
Non-binary	31%
Genderqueer	29%
Gender non-conforming or gender variant	27%
Gender fluid/fluid	20%
Androgynous	18%
Transsexual	18%
Agender	14%
Two-spirit	7%
Bi-gender	6%
Butch	5%
Crossdresser	5%
Multi-gender	4%
Third gender	4%
Intersex	3%
Drag performer (king/queen)	2%
A.G. or aggressive	1%
Stud	1%
Travesti	1%
Bulldagger	<1%
Fa’afafine	<1%
Mahu	<1%
A gender not listed above	12%

Respondents to the USTS reported that many live in extreme poverty. The survey sample was nearly four





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times more likely to have a household income of less than \$10,000/year compared to the general population. There may be many reasons underlying this fact, but the cost of medical assistance in transition, coupled with frequent loss of employment and alienation from family and social groups are likely to be significant factors. Perhaps unsurprisingly, given those factors, a high number of respondents reported suicidal ideation, with a staggering 41 percent of respondents reported attempting suicide compared to 1.6 percent of the general population. The rates rose even higher for those who lost a job due to bias (55 percent), were harassed/bullied in school (51 percent), had low household income, or were the victim of physical assault (61 percent) or sexual assault (64 percent).

The survey also showed that the disconnect between gender identity and assigned sex was recognized at a very early age. USTS respondents were asked how old they were when they first started to think of themselves as transgender, even if they did not know that particular word to describe themselves. One in 10 reported that they began thinking of themselves as transgender at age 5 or younger. Sixteen percent began to think of themselves as transgender between the ages of 6 and 10, and 28 percent between the ages of 11 and 15. Eight percent reported beginning to think of themselves as transgender at age 26 or older.

One of the issues facing transgender people that has received a significant amount of news coverage is the problem of ensuring safe access to public restrooms. Nearly one-quarter (24 percent) of respondents said that someone had questioned or challenged their presence in a restroom in the past year, and one in eight (12 percent) respondents said they were verbally harassed, physically attacked or sexually assaulted when accessing or using a restroom during the same period. Fifty-nine percent of respondents to the USTS said they avoided using a public restroom in the past year because they were afraid of having problems, and almost one-third (32 percent) limited the amount they ate or drank to avoid using the restroom.

There are some relative bright spots within the report as far as civility and professionalism are concerned. Respondents experience within the court system seemed to be somewhat better than with the general public at large. Of the 84 percent who believed that the judges and/or court staff thought or knew they were transgender during their interactions, three-quarters (75 percent) felt they were always treated with respect, almost one-quarter (22 percent) felt they were only sometimes treated with respect, and only 2 percent felt they were never treated with respect. Experiences varied, though, and people whose interactions with the courts involved criminal matters reported far higher incidences of disrespect from the court system.

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Legal Issues Facing Transgender Clients

Transgender clients seek legal help for all kinds of different reasons, but there are a few issues that more frequently affect the transgender population.

Of the respondents to the USTS survey from the State of Michigan, only 9 percent reported that all of their personal identification had the name and gender they preferred, while 81 percent reported that *none* of their identification had the name and gender they preferred. The cost of changing identity documents was one of the main barriers respondents faced, with 42 percent of those who have not changed their legal name and 40 percent of those who have not updated the gender marker on their identification reporting that it was because they could not afford it. Thirty-three percent (33 percent) of respondents who have shown an ID with a name or gender that did not match their gender expression reported that they were verbally harassed, denied benefits or service, asked to leave or assaulted.

Michigan law allows for the change of a person's gender marker on their birth certificate pursuant to MCL 333.2831(c). The statute requires that a request for a new gender marker be accompanied by "an affidavit of a physician certifying that sex-reassignment surgery has been performed."¹⁰ Because many transgender people may not be able to readily afford surgical treatment, and for some, such treatment may be medically dangerous or otherwise inappropriate, the American Civil Liberties Union of Michi-

FEATURE ARTICLE

gan filed a federal lawsuit in 2015 challenging the Michigan Secretary of State's policy requiring surgery to change the gender marker on drivers' licenses. As a result of that lawsuit, the Secretary of State introduced a new policy to allow gender marker on drivers' licenses to be changed upon the presentation of a valid United States passport.¹¹ Since the U.S. Department of State only requires a doctor's certification that a person "has had appropriate clinical treatment for gender transition" to change the gender marker on a passport, the requirement for surgical intervention no longer applies in that case.

Transgender people often experience job discrimination, particularly at or around the time they are transitioning. The United States Sixth Circuit Court of Appeals 2018 decision in *EEOC v. R.G.* emphatically makes it clear that transgender people are covered under Title VII in cases involving employment discrimination, stating that "Discrimination against employees, either because of their failure to conform to sex stereotypes or their transgender and transitioning status, is illegal under Title VII."¹² The case has recently been granted certiorari to the United States Supreme Court and the appeal remains pending.¹³ In this case, Aimee Stephens, a transgender woman who was "assigned male at birth," worked for six years at a family-owned funeral home. During that time, her gender

expression was male, and she used her male birth name in her professional capacity. She was fired from her employment as a funeral director when she notified her employer that when she returned from her scheduled vacation she would begin to live and work full-time as a woman. The funeral home argued that the termination was motivated by the sincerely held religious beliefs of the owner, and that "authorizing or paying for a male funeral director to wear the uniform for female funeral directors would render him complicit 'in supporting the idea that sex is a changeable social construct rather than an immutable God-given gift.'"¹⁴

Transgender people in prison populations often face difficulties in ensuring continuity of care for gender dysphoria. As of June 26, 2017, the Michigan Department of Corrections (MDOC) adopted a new policy for the care of transgender prisoners after a transgender woman incarcerated in a Michigan prison campaigned, with the help of the Southern Poverty Law Center (SPLC) and the American Civil Liberties Union of Michigan (ACLU of Michigan), to receive the hormone therapy she was denied.¹⁵ Jami Naturalite was denied the access by prison officials pursuant to a "freeze frame" policy to limit transgender inmates' medical care while in state custody, but the new policy will allow inmates to begin such treatment while in-

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carcerated, even if they did not start their treatment prior to going to prison.

Transwomen can face problems related to their participation in women's and girls' sports. News media have brought to the public's attention the challenges faced by 2016 Olympic gold medalist Caster Semanya, a female South African middle-distance runner who is not transgender, but whose naturally occurring level of male hormones has prevented her from competing unless she artificially reduces her testosterone level using drugs, according to a ruling by the International Association of Athletics Federation (IAAF).¹⁶ While less high-profile, there are related cases arising in high school and college athletics involving complaints by cisgender athletes about competing with transgender girls. In Connecticut, three female high school track and field athletes filed a Title IX discrimination complaint over the state's athletic transgender policy. The three athletes argue that running with transgender girls puts them at a competitive disadvantage, and hurts their chances of earning college scholarships.¹⁷ In a letter dated June 17, 2019, the group "Alliance Defending Freedom" noted:

Because Title IX focuses on equal opportunities between the sexes, because this Complaint is precisely concerned with effects of biological differences between males and females, because the term "boys" is commonly understood to refer to young males, and to avoid otherwise inevitable confusion, we refer in this complaint to athletes who are biologically male as "boys," and to athletes who are biologically female as "girls." We do not question any gender identity claimed by any students, and use the names preferred by each student rather than legal names.¹⁸

While it seems clear that "Alliance Defending Freedom" has no compunction about misgendering the transgender girls involved in this case, and seems outrightly hostile to the very existence of transgender people, this controversy points out a genuine issue about the limits of Title IX protections. The Gay, Lesbian & Straight Education Network (GLSEN) proposed a model high school athletics policy specifically aimed at eliminating discrimination for transgender and gender nonconforming students that covers a wide variety of topics including privacy, dress codes, bullying and use of names and pronouns. The model policy is based in part on the *Connecticut Safe Schools Guidelines* and attempts to "incorporate strong local policies and models and generalizing them for a national context."¹⁹

Beyond the issue of safe access to bathrooms, transgender people face continuing challenges to other kinds of public accommodation that get far less attention. In 2015, the Michigan Womyn's Music Festival ceased operations after 40 years rather than change its policy of only allowing attendance by "Womyn-Born Womyn."²⁰ This policy specifically excluded transwomen from attending the weeklong music event, and prompted protests within

the LGBT community, including the refusal of well-known artists like the Indigo Girls to continue to perform there. The ongoing controversy over the policy gave rise to the acronym "TERF," standing for "trans-exclusionary radical feminist." This acronym was applied to a distinct minority of feminists who espouse transphobic sentiments, including opposition to transgender rights and the inclusion of transwomen in women's spaces.²¹

And sadly, transgender people continue to be subject to high levels of personal violence, up to and including murder. Since 1999, November 20 has been observed as the Transgender Day of Remembrance (TDoR) to recognize transgender people, gender-variant individuals, and those perceived to be transgender who have been murdered because of hate and intolerance.²² Various countries around the world mark the observance of TDoR on November 20, and in 2017, the province of Ontario, Canada, enacted formal legislation to enshrine the day in law.²³ As practitioners, it is critically important that we take seriously our clients' concerns for their personal safety, and do not dismiss their fears as being unrealistic or over-dramatized.

And Finally – the Pronoun Question

I hope that after reading this far, I have been able to provide you some new information about working with transgender clients. As I said at the outset, the complexities faced by transgender people go far beyond whether they are referred to by the correct pronoun – but that is important, too. When you are working with a transgender person in your professional capacity, it is always appropriate to simply ask in a straightforward way what pronouns they use if you are unsure. If someone corrects you and says that they prefer to use a gender-neutral pronoun, like "they" and "them," then try to be consistent in using that particular pronoun when referring to them to others and in legal pleadings. I personally have never met anyone who has used a more unusual pronoun such as "xe" or "zie," but I like to think that if I did, I would try to respectfully refer to that person in the way that they request. A simple solution is often to use proper names, and this can often lessen the risk of unintentionally misgendering someone.

Frequently, the nature of the legal work we do for clients will require that we refer to someone's history before and after their transition. While this situation touches on the sensitive area of using someone's "deadname" as I discussed above, I always try to refer to my client by the gender they are expressing at the time when I meet them. While it may seem somewhat awkward to write a sentence like "her birth certificate records her sex as male and lists her name as John Doe," I think that doing so is more respectful to my client's gender identity and reaffirms the authenticity of their transition. As attorneys, we are supposed to be our client's advocate as well as their legal representative. As such, it is incumbent on us to present them to others as they would do for themselves. Being polite yet

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firm with opposing counsel and judges about how to properly refer to your client is a hallmark of professionalism, and most definitely a best practice to ensure your client is treated with the dignity and respect that all people should expect from the legal system.



Timothy S. Cordes focuses his solo practice on family law and probate administration. He is currently chair of the LGBTQA Law Section of the State Bar of Michigan and is proud to be one of the section's founding members. He is also a member of the Family Law Section of the State Bar and the OCBA Family Court Committee. Tim has been a member of the Stonewall Bar Association of Michigan since 2008, serving as its president from 2011 through 2014. As a straight ally, Tim has sought to be an advocate for the LGBT community on the issues of marriage equality and the discrimination that same-sex families with children face in our courts. Following a career in software development and management consulting, Tim attended law school at Michigan State University College of Law, graduating in 2005. In his spare time, Tim enjoys sailing the Great Lakes and writing and performing plays at

the Players Club in downtown Detroit. He and his wife (and their little dog, Spike) live in Bloomfield Township.

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Footnotes

- 1 <https://en.wikipedia.org/wiki/Cisgender>.
- 2 <https://www.unfe.org/wp-content/uploads/2017/05/UNFE-Intersex.pdf>.
- 3 *Id.*
- 4 <https://www.psychiatry.org/patients-families/gender-dysphoria/what-is-gender-dysphoria>.
- 5 *Id.*
- 6 <https://www.wpath.org/media/cms/Documents/About/Bylaws%20APPROVED%20by%20Members%201-22-2016.pdf>.
- 7 https://www.wpath.org/media/cms/Documents/SOC%20v7/Standards%20of%20Care_V7%20Full%20Book_English.pdf.
- 8 *Id.*
- 9 <http://www.ustranssurvey.org/>.
- 10 MCL 333.2831(c).
- 11 *Love v. Johnson*, 146 F Supp 3d 848 (ED Mich, 2015).
- 12 *EEOC v. RG*, 884 F3d 560 (CA 6, 2018).
- 13 *RG & GR Harris Funeral Homes, Inc v. EEOC*, ___US___; 139 S Ct 2049; 204 L Ed 2d 214 (2019).
- 14 *EEOC v. RG*, 884 F3d 560, 569 (CA 6, 2018).
- 15 <https://www.splcenter.org/news/2017/06/26/michigan-department-corrections-revises-policy-allows-transition-related-care-transgender>.
- 16 <https://www.theguardian.com/sport/2019/jul/30/caster-semenya-blocked-defending-800-metres-title-athletics-world-championships>.
- 17 <https://www.washingtonpost.com/sports/2019/06/19/girls-say-connecticut-transgender-athlete-policy-violates-title-ix-file-federal-complaint/>.
- 18 <http://www.adfmedia.org/files/SouleComplaintOCR.pdf>.
- 19 https://www.glsen.org/sites/default/files/Trans_ModelPolicy_2014.pdf.
- 20 <https://www.advocate.com/michfest/2015/04/21/years-michigan-womyns-music-festival-will-be-last>.
- 21 <https://en.wikipedia.org/wiki/TERF>.
- 22 <https://www.hrc.org/campaigns/transgender-day-remembrance>.
- 23 <https://www.cp24.com/news/ontario-enshrines-trans-day-of-remembrance-in-law-as-nov-20-1.3718985>.



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