

# **EXHIBIT A**

**Declaration of Chelsea Mitchell in  
Opposition to Preliminary Injunction**

**UNITED STATES DISTRICT COURT  
DISTRICT OF IDAHO**

LINDSAY HECOX, and JANE DOE with her  
next friends JEAN DOE and JOHN DOE,

*Plaintiffs,*

v.

BRADLEY LITTLE, in his official capacity  
as Governor of the State of Idaho; SHERRI  
YBARRA, in her official capacity as the  
Superintendent of Public Instruction of the  
State of Idaho and as a member of the Idaho  
State Board of Education; THE  
INDIVIDUAL MEMBERS OF THE STATE  
BOARD OF EDUCATION, in their official  
capacities; BOISE STATE UNIVERSITY;  
MARLENE TROMP, in her official capacity  
as President of Boise State University;  
INDEPENDENT SCHOOL DISTRICT OF  
BOISE CITY #1; COBY DENNIS, in his  
official capacity as superintendent of the  
Independent School District of Boise City #1;  
THE INDIVIDUAL MEMBERS OF THE  
BOARD OF TRUSTEES OF THE  
INDEPENDENT SCHOOL DISTRICT OF  
BOISE CITY #1, in their official capacities;  
THE INDIVIDUAL MEMBERS OF THE  
IDAHO CODE COMMISSION, in their  
official capacities,

*Defendants.*

Case No. 1:20-cv-00184-DCN

**DECLARATION OF  
CHELSEA MITCHELL IN OPPOSITION  
TO PRELIMINARY INJUNCTION**

**DECLARATION OF CHELSEA MITCHELL**

I, Chelsea Mitchell, declare as follows:

1. I am a seventeen-year-old graduate of Canton High School in Canton, Connecticut.
2. I am an elite female athlete and competed in Connecticut Interscholastic Athletic Conference (CIAC) track and field events throughout all four years of high school.

3. A CIAC policy allows biological males who identify as girls to compete in the girls' category and on girls' athletic teams.

4. From the Spring 2017 outdoor track season through the Winter 2020 indoor track season<sup>1</sup>—six track seasons—I competed against biological males in my track and field athletic events due to the CIAC policy.

5. I understand that some individuals in this case state that they are not aware of any biological girls being harmed by the presence of transgender athletes competing in their league.

6. I personally have been harmed by competing against male athletes in my league. In total, I have lost four state championship titles, two All New England awards, medals, points, and publicity due to the CIAC policy that permits males to compete in girls' athletic events in Connecticut.

***2016-2017 Freshman Year***

7. I first competed against a male in girls' track and field as a fourteen-year-old freshman at the Spring 2017 outdoor CIAC State Open Championship.

8. On the way to this meet, I was instructed by my coach to respond “no comment” if asked about the issue of males competing in the female category.

9. In the 100m final at the 2017 outdoor State Open, I placed 7th overall. The top six receive a medal and qualify to advance to the New England Regional Championship: one of those top six spots was taken by male athlete Andraya Yearwood:

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<sup>1</sup> The Spring 2020 outdoor season was cancelled due to the global COVID-19 pandemic.

**Table 1: 2017 CIAC State Open Women’s Outdoor Track 100m Results (June 5, 2017)<sup>2</sup>**

Place	Grade	Sex	Name	Time	High School
1*	12	F	Caroline O’Neil	12.14s	Daniel Hand
2*	12	F	Kathryn Kelly	12.36s	Lauralton Hall
3*	9	M	Andraya Yearwood	12.41s	Cromwell
4*	11	F	Tia Marie Brown	12.44s	Windsor
5*	12	F	Kiara Smith	12.59s	Jonathan Law
6*	11	F	Kate Hall	12.62s	Stonington
7	9	F	Chelsea Mitchell	12.69s	Canton
8	12	F	Tiandra Robinson	FS	Weaver

\* Qualified for the New England Championship.

### *2017-2018 Sophomore Year*

10. During my sophomore year, I learned that Andraya Yearwood’s school was reclassified to the Class S division for indoor track events (the school remained a Class M for outdoor track events)—which was the same class as my school.

11. This news was upsetting for me because I would now be racing against a male competitor at both the Class S championship and the State Open championship.

12. At the February 10, 2018, indoor Class S Championship in the 300m, I was knocked out of advancing to the State Open by just one spot—a spot was taken by Andraya.

13. On April 27, 2018, at the first invitational race of the Spring 2018 outdoor season, I was seeded in the 100m in a lane beside not just one, but two male athletes: Terry Miller and Andraya Yearwood.

14. I distinctly remember seeing Terry look over to Andraya and say: “You and me, one and two.” At fifteen years old, I felt extremely intimidated to run against bigger, faster, and stronger male competitors.

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<sup>2</sup> AthleticNet, <https://www.athletic.net/TrackAndField/meet/306453/results/f/1/100m>, last visited June 2, 2020.

15. But Terry was right. I should have won that 100m race; but instead, Terry and Andraya took first and second place, while I placed third.

16. Similarly, at the Spring 2018 outdoor State Open Championship, Terry won the women's 100m event by a wide margin, while Andraya finished second.

17. But for CIAC's policy, I would have won second place statewide:

**Table 2: 2018 CIAC State Open Championship Women's Outdoor Track 100m Results (June 4, 2018)<sup>3</sup>**

Place	Grade	Sex	Name	Time	High School
1*	10	M	Terry Miller	11.72s	Bulkeley
2*	10	M	Andraya Yearwood	12.29s	Cromwell
3*	11	F	Bridget Lalonde	12.36s	RHAM
4*	10	F	Chelsea Mitchell	12.39s	Canton
5*	11	F	Maya Mocarski	12.47s	Fairfield Ludlowe
6*	10	F	Selina Soule	12.67s	Glastonbury
7	12	F	Tia Marie Brown	12.71s	Windsor
8	11	F	Ayesha Nelson	12.80s	Hillhouse

\* Qualified for the New England Championship.

18. Bridget Lalonde beat me by just three-hundredths of a second, but I was so relieved that she did. Emotionally, it was less of a loss to be denied runner-up status than to be denied a first place State Open Championship—a feat almost unheard of for a high school sophomore.

19. At the 2018 outdoor New England Regional Championship, I placed seventh in the 100m. Only the top six medal and receive the All New England award—one of those top six spots was taken by Terry.

20. Had I earned the title of All New England, I would have made Canton High School history as the first Canton female athlete to win this prestigious award.

<sup>3</sup> AthleticNet, <https://www.athletic.net/TrackAndField/meet/334210/results/f/1/100m>, last visited June 2, 2020.

***2018-2019 Junior Year***

21. In the fall of my junior year, I learned that male athlete Terry Miller transferred to Bloomfield, another Class S school.

22. I was devastated, fearing that with two males competing in my division, my chances of ever winning a state championship in sprints were now over.

23. I trained harder than ever, spending countless hours to shave mere fractions of seconds off of my times. I never missed a practice, squeezed in extra workouts where I could, and saw my race times consistently drop.

24. But it was not enough. And my fears of losing championship after championship were realized in the Winter and Spring 2019 seasons.

25. At the February 7, 2019, indoor Class S State Championship, Terry finished first in the 55m. I placed second. But for the CIAC's policy, I would have been named the Class S State Champion in the 55m.

26. The February 16, 2019, indoor State Open Championship saw similar results and a similar impact. Terry and Andraya finished first and second respectively in both the preliminary and final Women's 55m races, each time defeating the fastest girl by a wide margin. I placed third in the final.

27. But for CIAC's policy, I would have won the 2019 State Open Championship in the 55m dash:

**Table 3: 2019 CIAC State Open Championship Women's Indoor Track 55m Preliminary Results (February 16, 2019)<sup>4</sup>**

Place	Grade	Sex	Name	Time	High School
1*	11	M	Terry Miller	7.00s	Bloomfield
2*	11	M	Andraya Yearwood	7.07s	Cromwell
3*	12	F	Cori Richardson	7.24s	Windsor
4*	11	F	Chelsea Mitchell	7.27s	Canton
5*	12	F	Kate Shaffer	7.27s	Conard
6*	12	F	Ayesha Nelson	7.29s	Hillhouse
7*	12	F	Maya Mocarski	7.34s	Fairfield Ludlowe
8	11	F	Selina Soule	7.37s	Glastonbury
9	10	F	Kisha Francois	7.41s	East Haven

\* Qualified for the women's 55m final.

**Table 4: 2019 CIAC State Open Championship Women's Indoor Track 55m Final Results (February 16, 2019)<sup>5</sup>**

Place	Grade	Sex	Name	Time	High School
1*	11	M	Terry Miller	6.95s	Bloomfield
2*	11	M	Andraya Yearwood	7.01s	Cromwell
3*	11	F	Chelsea Mitchell	7.23s	Canton
4*	12	F	Kate Shaffer	7.24s	Conard
5*	12	F	Ayesha Nelson	7.26s	Hillhouse
6*	12	F	Maya Mocarski	7.33s	Fairfield Ludlowe
7	12	F	Cori Richardson	7.39s	Windsor

\* Qualified for the New England Championship.

28. Instead, I was not named State Open Champion in the 55m, I received a bronze medal instead of a gold medal, and I did not make Canton High School history as the first ever Canton female athlete to be named a State Open Champion.

29. However, after the 55m race, I returned to the finals of the long jump, which had no males competing. While listening to them announce Terry as the winner and new meet record holder in the 55m, I won the long jump event to solidify my place in the Canton record books as the first Canton indoor track athlete—male or female—to be named a State Open Champion.

<sup>4</sup> AthleticNet, <https://www.athletic.net/TrackAndField/meet/352707/results/f/1/55m>, last visited June 2, 2020.

<sup>5</sup> *Id.*

30. State Champions are recognized as All-State Athletes, an award listed on college applications, scholarship applications, and college recruiting profiles. State Champions are invited to the All-State Banquet, and get their name celebrated on a banner in their high school gym. I did not receive any of these awards for the 55m. But I was able to receive these awards for my long jump championship.

31. After the State Open Championship, I was repeatedly referred to in the press as the “third-place competitor, who is not transgender.” I was the fastest biological girl in the 55m race at the State Open Championship, but the press did not mention my name—I felt invisible.

32. At the March 2, 2019, indoor New England Regional Championship, Terry took first and Andraya took third place in the 55m dash. I missed medaling and being named All New England Champion by just two spots—two spots that were taken by male competitors.

33. Following Terry Miller’s sweep of the CIAC’s Indoor Class S, State Open, and New England titles in the 55m dash and 300m, Terry was named “All-Courant girls indoor track and field athlete of the year” by the Hartford Courant newspaper. This felt like an injustice to my fellow female athletes.

34. In the Spring 2019 outdoor season, I competed against both Terry and Andraya in the Class S Championship. At this event, I ran the fastest biological female times in the 100m and 200m across all state class meets.

35. But because of the CIAC’s policy, being the fastest biological girl just was not good enough to experience the thrill of victory. Instead, at the 2019 Class S Championship, Terry placed first in the 100m and 200m, while I placed second in both events. I won the long jump and received a state title. But because of the CIAC’s policy, I took home only one state title instead of three.



36. The trend continued at the 2019 outdoor State Open Championship as Terry easily won the women's 200m race. But for CIAC's policy, Cori Richardson would have won the state championship, Alanna Smith would have finished runner-up, and Olivia D'Haiti would have advanced to the New England Championship:

**Table 5: 2019 CIAC State Open Championship Women's Outdoor Track 200m Final Results (June 3, 2019)<sup>6</sup>**

Place	Grade	Sex	Name	Time	High School
1*	11	M	Terry Miller	24.33s	Bloomfield
2*	12	F	Cori Richardson	24.75s	Windsor
3*	9	F	Alanna Smith	25.01s	Danbury
4*	11	F	Chelsea Mitchell	25.24s	Canton
5*	12	F	Nichele Smith	25.38s	East Hartford
6*	12	F	Bridget Lalonde	25.55s	RHAM
7	12	F	Olivia D'Haiti	25.63s	Kolbe-Cathedral

\* Qualified for the New England Championship.

37. But I did receive one opportunity to compete on a more level playing field. At the Spring 2019 State Open Championship in the 100m, Terry, the top-seed in the race, false-started and was disqualified. This opened the door for me: I was able to relax, focus on my race, and win. I set a personal record of 11.67 seconds, made Canton High School history as the first sprinter to be a state open champion in any sprint event, medaled, received significant media publicity, and advanced to the New England Regional Championships.

38. I went on to win the New England Regional Championships in the 100m dash and was named All New-England. Here, too, I made Canton High School history as the first female to win a New England Championship.

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<sup>6</sup> AthleticNet, <https://www.athletic.net/TrackAndField/MeetResults.aspx?Meet=364088&show=all>, last visited June 2, 2020.

39. Thereafter, I was awarded Track Athlete of the Year by the Connecticut High School Coaches Association, and the Hartford Courant named me 2019 All-Courant Girls Outdoor Track and Field Athlete of the Year and the Bo Kolinsky Female Athlete of the Year (across all sports).

40. My new personal record, State Open Champion and All New-England awards put me in a much better recruiting position for college scholarships—all because a false start that prevented a male from competing against me in the women’s division leveled the playing field.

***2019-2020 Senior Year***

41. A similar scenario played out in the Winter 2020 season. At the indoor Class S Championship 55m race, Andraya Yearwood—the top seed in the race and the individual ranked number one in the state for the women’s 55m dash—false-started and was disqualified. That false start opened the door for me to not only win the CIAC Class S Championship in the 55m dash, but also to advance to the 2020 Connecticut State Open Championship in the 55m event and win.

42. To my disappointment, the 2020 Spring outdoor season was cancelled in light of the global COVID-19 pandemic.

43. I just completed my senior year of high school and the final track season of my high school athletic career.

44. It feels defeating to know that records at my high school, CIAC, AthleticNet, MySportsResults, CT.Milesplit.com, and others do not reflect the four state titles and two All New England awards I should have earned. It is upsetting to know that the meet records of many great female athletes before me have also been wiped from the books.

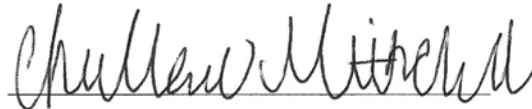
45. Competing against males makes me feel anxious and stressed. And stress has a direct, negative impact on my athletic performance.

46. I try to stay positive, to take support from family and friends, but it is hard when I know that I must compete against those who have a biological advantage because they were born male.

47. I hope that future female athletes will not have to endure the anxiety, stress, and performance losses that I have while competing under a policy that allows males to compete in the female category.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2 day of June, 2020

A handwritten signature in cursive script, appearing to read "Chelsea Mitchell", written over a horizontal line.

Chelsea Mitchell