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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

RYAN KARNOSKI, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 2:17-cv-01297-MJP

**DECLARATION OF JANE DOE IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION
AND PLAINTIFF JANE DOE'S
MOTION TO PROCEED UNDER
PSEUDONYM**

I, Jane Doe, declare as follows:

1. I am a plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.

2. I am a 29-year-old woman, and I am currently serving in the U.S. military.

3. I am also transgender, although I have not yet transitioned to living openly as a woman. Because of the federal government's recently announced policy with respect to transgender service members, I am limiting the information in my testimony to exclude identifying information, for fear that I would be separated from the military on the basis of my transgender status or face other negative consequences.

4. I joined the military to serve my country and for the security and stability that a

1 military career provides. I enjoy the challenge my military career provides, and I take pride in
2 my role in protecting our country and helping others save innocent lives.

3 5. I desire to continue serving in the military for the maximum number of years I am
4 permitted to do so openly. My re-enlistment window opens within the next year.

5 6. I was assigned the sex of male at birth. However, I have felt since I was 11 years
6 old, and known since I was 20 years old, that I am female. I have long hoped to be able to
7 transition to living openly as a woman, but the prospect of doing so felt unattainable in the past,
8 without a supportive environment in which to transition.

9 7. On or around June 30, 2016, I became aware that the ban on open military service
10 by transgender individuals had been lifted. I was very excited and nervous about the possibility
11 of serving openly as a woman. In October 2016, I began extensively reviewing the materials the
12 military was releasing to implement the lifting of the ban. In December 2016, I attended my
13 command-level training on the new policy. Around that time, I decided to come out as
14 transgender to select colleagues whom I felt I could trust. I also researched what was required to
15 formally change my gender marker in the military's Defense Enrollment Eligibility Reporting
16 System.

17 8. I decided to begin my legal and medical transition and begin the process of
18 officially changing my gender marker once I was posted at my next assigned location. I planned
19 to time and structure my transition so that it was as smooth as possible for me and others. I
20 wanted to work carefully with military medical personnel and my Commanding Officer, giving
21 him plenty of time to prepare my unit so that my transition would go smoothly for everyone. I
22 also wanted the other service members at my next assigned location to get to know me as a
23 valuable individual member of the team. I additionally wanted to give myself some time to come
24 out to individuals to whom I could look for support. I transferred to this assigned location in July
25 2017.

26 9. On July 26, 2017, President Trump posted three tweets that said that transgender
27 people would not be able to serve in the military "in any capacity." After I saw the President's
28 tweets, I decided to put my plans to transition, come out as transgender, live openly as a woman,

1 and change my gender marker, on hold.

2 10. Because of this change in policy, I have not come out to anyone in my chain of
3 command. I am open to a few select individuals with whom I serve, as well as a group of
4 veterans with whom I communicate about my gender identity for support and friendship.

5 11. I have been extremely anxious and stressed about what to do next. I have placed
6 my life “on hold.” I have not come out as transgender to any additional people in my life; I have
7 not pursued any of the steps required for me to transition; and I no longer know if I will be able
8 to continue serving in the military, a career that I love and wish to continue. This is all due to the
9 announced policy banning transgender people like me from serving openly in the military.

10 12. I am terrified that my career will be brought to an early end because of the
11 President’s decision to ban transgender individuals from military service. That fear is heightened
12 by the prospect of having to use my name to participate in this lawsuit.


13 13. The ban on open service for transgender military personnel harms my mental and
14 emotional health by causing me to continue living as if I were a man, even though I am a
15 woman, and by indefinitely delaying, if not altogether prohibiting, my medical and legal
16 transition to living openly as female.

17 14. In short, I am caught between a rock and a hard place. If I transition, I lose my
18 career and everything that comes with it—including my current income, my benefits, my future
19 employability outside the military, and my identity as a service member. If I do not transition,
20 then I give up the expression of who I am on the most fundamental level and, instead, must
21 continue living as someone that I am not.

22 15. All that I want is to live openly as the woman I am and to serve my country with
23 respect and dignity.

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

25
26 DATED: September 13, 2017


Jane Doe

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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States of America and the laws of the State of Washington that on September 14, 2017, I caused true and correct copies of the foregoing documents to be served by the method(s) listed below on the following interested parties:

By Hand Delivery:

US Attorney’s Office
700 Stewart St., Suite 5220
Seattle, WA 98101-1271

By Registered or Certified Mail:


Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Department of Defense
1400 Defense Pentagon
Washington, DC 20301-1400

Secretary of Defense James N. Mattis
1000 Defense Pentagon
Washington, DC 20301-1000

President Donald J. Trump
1600 Pennsylvania Ave. NW
Washington, DC 20500

I hereby certify under the penalty of perjury that the foregoing is true and correct. Executed on September 14, 2017 at Seattle, Washington.



Rachel Horvitz, *Paralegal*