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19 Does 1-2, Jane Doe, and Equality California*

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 AIDEN STOCKMAN; NICOLAS
TALBOTT; TAMASYN REEVES;
23 JAQUICE TATE; JOHN DOES 1-2;
JANE DOE; and EQUALITY
24 CALIFORNIA,

25 Plaintiffs,

26 v.

27 DONALD J. TRUMP, et al.

28 Defendants.

CASE NO. 5:17-cv-01799-JGB-KKx

**DECLARATION OF [REDACTED]
[REDACTED], A.K.A. JOHN DOE 1, IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

1 I, John Doe 1, declare as follows:

2 1. I currently serve as a Non-Commissioned Officer E-5 Staff Sergeant
3 in the United States Air Force. I am 28 years old. I am transgender.

4 **Early Life**

5 2. Ever since I was a child, I have wanted to serve in the United States
6 military. I grew up with my dad telling me stories about his 30 years of service in
7 the United States Marine Corps. He told me how he decided to join the Marines
8 after watching an interview where a wounded marine referred to his unit as “his
9 brothers.” I always felt connected to my dad and his stories. Sometimes, I would
10 put on his uniform and pretend that I was a marine like him. I wanted that sense of
11 camaraderie that my dad had described.

12 3. My entire life has involved the military. Because of my dad’s service,
13 I grew up living on or near military bases. My extended family similarly is
14 connected to the military, with several uncles and cousins having served in the
15 Marines, Army and Air Force. All my childhood friends also had parents in the
16 military. As a child I knew that, when the time came, I would also serve my
17 country in the military.

18 4. After earning my college degree in general education, I enlisted in the
19 Air Force. I had just turned 23.

20 **Military Career and Compensation**

21 5. I entered basic training in 2012. After completion of basic training, I
22 continued onto technical school. Technical school provides the technical training
23 necessary for our roles in the Air Force. In technical school, my command
24 selected me to be an Airmen Leader. To be selected as an Airman Leader is to be
25 recognized as someone upholding airmen standards, such as professionalism,
26 integrity and commitment to one’s duty. I was responsible for room inspections
27 and making sure that my floor and my fellow airmen met Air Force standards. I
28 served as a resource and a guide for my peers.

1 6. After being stationed domestically, I was promoted to Senior Airman
2 “below the zone,” which means I was promoted ahead of schedule. I then was
3 selected for an instructor position in the Air Force intelligence community.

4 7. In 2016, I received a “must promote” recommendation from my
5 command in my performance report, which is one of the strongest endorsements
6 for promotion that your command can give. I then was promoted to the Non-
7 Commissioned Officer rank of Staff Sergeant.

8 8. As Staff Sergeant, I attended Airmen Leadership School. I was the
9 top student in my class. For being the top student, I received the Academic
10 Achievement award. I also received Distinguished Graduate honors, which is
11 awarded only to the top 10% of a graduating class.

12 9. Currently, I am also a class instructor. I am known as a subject matter
13 expert in the information technology requirements of our intelligence gathering
14 community. I write course materials for information technology courses pertaining
15 to the military intelligence community.

16 10. As the next step in my career, I expect to be promoted to Technical
17 Sergeant, which is E-6 rank. To be promoted, I must serve two years as an E-5
18 Staff Sergeant and pass an exam. I will have served two years as E-5 in 2019.

19 11. I currently earn about \$26,400 a year, with an additional \$1,400 per
20 month housing allowance and a \$350 per month food allowance. I also receive an
21 annual allowance for my uniforms, which are my work clothes. I expect a
22 promotion to E-6 which comes with a pay raise.

23 12. In addition, I receive comprehensive health, vision, and dental
24 coverage through the military’s insurance provider, TRICARE.

25 **Serving My Country as a Transgender Airman**

26 13. For as long as I can remember, I have felt that inside, I am male. I did
27 not know the name to put to these feelings.

28

1 14. The first time I learned about transgender identity, I was 21 and
2 attending college. I started watching internet videos of transgender people
3 transitioning from the gender designated for them at birth to the gender that they
4 felt inside. I watched these videos for hours, but I would not admit to myself the
5 source of my interest. I already had been excommunicated from my church for
6 dating a woman. I feared further stigmatization and isolation if I admitted to
7 myself and others that I am transgender.

8 15. In 2016, while serving as a Senior Airman in the military, I became
9 friends with a transgender man. As I watched him navigate his transition, I
10 understood that I needed to come to terms with the fact that I too am transgender. I
11 became more confident in my gender identity, and knew that I had a support
12 system in the military. I no longer worried what my family or church would think
13 of me. I finally felt comfortable saying that I am transgender.

14 16. Later in 2016, I learned that the military was lifting its ban on open
15 service by transgender people. I felt excited, but at that point in time, I was not
16 sure that I wanted to begin transitioning while serving in the military.

17 17. In March 2017, I came to realize that if the military had decided it
18 would welcome transgender servicepeople, then I owed it to the military and to
19 myself to be open about my true identity. In April 2017, I went to my military
20 doctor, who diagnosed me with gender dysphoria. I came out to my chain of
21 command. I received my medical transition plan and now hope to begin Hormone
22 Replacement Therapy (“HRT”).

23 **The Ban**

24 18. In July 2017, I saw on Twitter that President Trump planned to
25 separate all transgender servicepeople from the military. I felt betrayed by my
26 Commander in Chief.

27 19. Then, in August 2017, I learned that a formal statement had been
28 issued and that open military service by transgender people would no longer be

1 permitted. I feared what would happen to me and to my fellow transgender
2 servicepeople. I came out as transgender only because the military had said that I
3 would be allowed to continue serving my country. I was told by some transgender
4 friends, who have not yet started transitioning, that they had asked for their
5 transgender status to be removed from their military record. But I know that this
6 cannot be erased from my military record. Despite being good airmen, I and others
7 will be discharged under the express terms of the ban.

8 **The Impact of the Ban**

9 20. I had planned to serve 20 years in the Air Force and I expected to
10 qualify for a retirement pension. But when the ban is implemented as to currently
11 enlisted transgender servicepeople, which I understand will be no later than March
12 2018, I will lose my income and my healthcare. I must make choices now based
13 on this seeming inevitability. I do not know how I will afford housing, food,
14 clothing or health insurance.

15 21. I understand that the ban denies me transition-related medical care.
16 Currently, I plan to pay out of pocket for chest surgery, also called “top surgery.”
17 My command has agreed to give me time off for the procedure

18 22. I fear that I will receive a less than Honorable discharge, which in
19 nearly every circumstance would bar my use of the GI bill for further training or
20 education in civilian information technology. Under “Don’t Ask, Don’t Tell,”
21 lesbians and gays received Dishonorable discharges. The information technology
22 needs of civilians differ from the needs of the military intelligence community. I
23 believe that I need additional training and education before I can leverage my
24 military skills into a civilian job.

25 23. I also do not know if I will be able to find a job in the civilian job
26 market. I know that transgender people face significant discrimination in
27 employment. On top of that, I worry that it will be problematic to find a civilian
28 job now that the government has declared me “unfit” to serve in the military.

1 24. My military service to my country has been recognized and lauded by
2 those within the military, yet the ban has suddenly declared it dispensable. I worry
3 that the ban will erode the hard earned trust of my unit, and that is dangerous.
4 Military readiness and lethality depends on us servicemembers trusting each other,
5 and when the Commander in Chief tells my comrades that I cannot perform the job
6 that my unit counts on me to do, it weakens the trust that keeps us safe.

7 25. I fail to see how, in a few short months, I went from first in my class
8 at Airmen Leadership School to being “unfit” to serve. I came out as transgender
9 because my military’s leaders said that I could safely do so. Now, I will lose
10 everything for which I have worked so hard. My entire life, I have wanted to serve
11 my country. Under the ban, I am losing that opportunity and the strong military
12 family with whom I serve. I did nothing to deserve this punishment.

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

Dated: September 28, 2017



Staff Sergeant
United States Air Force