

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

Brock Stone, et al.,

*Plaintiffs,*

v.

Donald J. Trump, et al.,

*Defendants.*

Case No. 1:17-cv-02459 (MJG)

**DECLARATION OF TEAGAN GILBERT**  
**IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Teagan Gilbert, hereby declare:

1. The facts set forth in this declaration are based on my personal knowledge.

**Personal Background Information**

2. I am a 31-year-old Petty Officer First Class in the U.S. Navy. I have served in the U.S. Navy for more than 13 years, including a one-year deployment to Afghanistan.

3. At age 17, I joined the Navy through the Delayed Entry Program (DEP). My family inspired me to join the military. My father was in the Air Force. Both of my grandfathers served in the Army.

4. I have received specialized military training and education, including experience with Department of Defense (DoD) space systems. I am currently serving in the Naval Reserve working as an information and space systems technician.

5. I am transgender. I revealed my transgender status to military personnel following, and relying on, the DoD's June 2016 Open Service Directive.

6. Pursuant to an evaluation and recommendation by DoD medical personnel, I am currently undergoing hormone therapy deemed a medically-necessary part of transition to the female gender and plan to seek approval of medically-indicated surgical treatment, including gender confirmation surgery.

7. I look forward to continuing to serve my country honorably in the U.S. Armed Forces, including through future overseas deployments. Since joining the military, it has been my goal to serve for at least 20 years. With only one year of coursework left in my undergraduate geology degree at Arizona State University, I plan to apply to Officer Candidate School (OCS) and return to “active duty” status.

#### **Effect of Transgender Service Member Ban**

8. On July 26, 2017, the President tweeted that transgender service members would no longer be allowed to serve in the military “in any capacity.”

9. I was extremely upset at this news. Fellow service members and I had not received any indication that the military planned to change its Open Service Directive. Relying on this very directive, I had revealed my transgender status to military personnel. When I read the President’s tweets, I felt that I had been misled and betrayed.

10. On August 25, 2017, I learned that President Trump sent a memorandum to the Secretary of Defense ordering him to reverse the policy allowing transgender people to serve openly in the military (Transgender Service Member Ban).

11. I feel the Transgender Service Member Ban has made it harder for me to receive reservist assignments. I am worried about finding reservist work next summer and earning enough money to continue to take courses and earn my degree at Arizona State University.

12. I planned to serve in the Armed Forces for the rest of my career. Now, I fear being discharged. I will be denied the opportunity to continue to pursue my chosen, honorable profession. I will also be deprived of \$400 per month of wages during the academic year and thousands of dollars during the summer. If discharged, I will lose not only my own health care but also health care for my six-year-old son. I have sole custody of my son, and I am his only financial provider. Any loss of wages and other military benefits will result in financial hardship for me and my family.

13. Since the Transgender Service Member Ban, I have experienced intense uncertainty, stress, and psychological harm. The day the President tweeted I immediately took paid time-off from my civilian job. I rushed to complete outstanding civilian and military name change and gender marker paperwork. Since I returned to my civilian job, my supervisor has told me that my productivity has decreased. While I am at work, I am stressed. I worry about my career and how I will afford health care and tuition if I am discharged based on my open transgender status. I worry about how I will provide for my son. As a result of this relentless uncertainty and stress, I have recently begun to receive poor performance evaluations through verbal feedback at my civilian job. My prior evaluations for this job were positive.

14. I have experienced stigma since the Transgender Service Member Ban. The President's statements and actions have signaled to me that my military service to the United States is not valued or wanted. After 13 years in the military, including a deployment to Afghanistan, I never expected such treatment. Since the Ban, I have become a second-class citizen.

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

Executed on the 11th day of September, 2017 in Peoria, Arizona.

A handwritten signature in black ink, appearing to read "Teagan Gilbert", written over a horizontal line.

Teagan Gilbert