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DOE, et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Civil Action No. 17-cv-1597 (CKK)
)	
DONALD TRUMP, et al.,)	
)	
<i>Defendants.</i>)	
)	

I, Dylan Kohere, declare as follows:

Early Life and Entry into Army ROTC

3. I considered enlisting directly after high school but eventually decided that going to college and enrolling in ROTC would be a better option for me. With ROTC, I can get a college education before I start my service and will have the career opportunities that come with being commissioned as an officer.

4. I have just started my first year of college and am living in ROTC housing. At this point in my program, we do not wear uniforms, but we have physical training three times per week and classroom instruction one day per week.

Transgender Identity and Coming Out

5. From a very young age, I was always interested in the things boys were interested in. I spent most of my time with the boys and did “guy stuff.” At that point, I did not know what being transgender meant, and I did not openly identify as a boy. I was just myself.

6. Everyone around me accepted my gender nonconformity until sometime during middle school. At that point, some people started to make fun of me for being too masculine. That was when I started to understand that there are stereotypes and expectations that people have about gender and how boys and girls are supposed to act. I started trying to conform to those stereotypes by making my appearance more feminine like the girls around me. I was depressed and really unhappy when I looked at the person in the mirror, because I knew that was not who I was.

7. When I entered high school, I became a member of the school’s Gay-Straight Alliance (“GSA”). In the GSA, our first meeting was about transgender issues, and I began to learn more about what gender identity is. During my freshman year, I began to come out as transgender, first to close friends and then to my family and others.

8. I had a good support system at my high school. My friends were very supportive, and there were also some very supportive teachers. By my senior year, I was president of the school GSA.

9. So far, everyone in the ROTC program has been very accepting of my transgender identity. My Sergeant knows I am transgender and has been supportive. I asked her whether

there are any regulations that might affect my participation in ROTC and she said she didn't know.

10. I have started working with medical professionals to begin a treatment plan for my transition. At this point, my health care is paid for by my parents' health insurance. I expect that my transition will be complete long before I graduate from college.

Effect of Changing Military Policy on Service by Transgender People

11. A big part of the reason I was comfortable coming out as transgender in the ROTC was the announcement in the summer of 2016 that transgender people would be able to serve openly in the military. I was so excited that I would be able to achieve my goal of serving while remaining true to who I am.

12. On July 26, 2017, as I was getting ready to go to college and enter ROTC, the President tweeted that transgender service members would no longer be allowed to serve in the military "in any capacity."

13. I was shocked and angry. I felt that the plans I had made for the rest of my life were being thrown out the window. I felt like I was no longer in control of my life, as if my life plans and goals were in someone else's hands.

14. On August 25, 2017, I learned that President Trump sent a memorandum to the Secretary of Defense and ordered him to reverse the policy allowing transgender people to serve openly in the military.

15. When I came out as transgender in my ROTC program, I was relying on the official policy announced in 2016 that transgender people would be able to serve openly. If the President's new ban means that the policy allowing open service is not true, and if the new ban is permitted to stand, I will never be able to serve as a member of the Armed Forces. It is

disheartening to learn that I could be denied an opportunity to serve based on something that has nothing to do with my ability or performance.

16. I am living with a great deal of uncertainty because I have not been able to obtain any information about my future military service or how it will affect my participation in ROTC. I am very concerned that I will not be allowed to complete my ROTC program or enter the military.

17. I will lose many things if the President's ban prevents me from serving or completing ROTC. First of all, I will lose educational and career opportunities. ROTC provides unique educational benefits and training, including extensive leadership training not available to other college students. This training is valuable in itself, but especially so because ROTC leads to a unique and very important career opportunity by allowing graduates to enter service as a military officer. If I am not allowed to enter military service or remain in ROTC, I will no longer have access to these opportunities, which is especially difficult for me since I had planned to make my entire career in military service.

18. If I am not allowed to continue in ROTC or sign a commitment to military service, I will also lose the opportunity to apply for a ROTC scholarship. I will have to pay for my own education, losing tens of thousands of dollars in tuition and living expenses that I could have earned with a scholarship.

19. The President's statements and reversal of the policy permitting open service have also affected the way I view my future prospects and life goals. To be told that I cannot serve for reasons that have nothing to do with my ability is hard to deal with, and I am frustrated by the unfairness of my situation. I want to serve in the military because I want to serve my country. To be denied that opportunity is extremely painful.

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

DATED: August X, 2017

/s/_____
Dylan Kohere