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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

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

Plaintiffs,

v.

DONALD J. TRUMP, et al.

Defendants.

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

DECLARATION OF RICK ZBUR, EXECUTIVE DIRECTOR OF EQUALITY CALIFORNIA IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

I, Rick Zbur, declare as follows:

1. I am the Executive Director of Equality California, the nation's largest statewide lesbian, gay, bisexual, transgender and queer ("LGBTQ") civil rights organization.

Equality California's Mission

2. Equality California advocates locally, statewide and nationally on behalf of LGBTQ individuals and other marginalized groups. Equality California works to ensure that all LGBTQ individuals fully, freely and equally can participate in society. Our mission includes civil rights advocacy and improving health outcomes for LGBTQ people, which includes transgender people.

3. While Equality California has members throughout the nation, Equality California primarily advocates in California, where the majority of its membership resides. California has the largest population of LGBTQ people, including transgender people, and has the largest population of active military service members. As such, California has the largest population of transgender active military service members.

Transgender Members of Equality California

4. Equality California counts among its members transgender individuals who currently serve in the United States military. In reliance on the policy and accompanying instructions announced June 2016 that specifically permitted transgender troops to serve openly, some of our members came out as transgender to their chain of command. Other Equality California members who are transgender and are actively serving in the military opted not to come out for fear of retribution and separation. Also included among Equality California's members are transgender individuals who wish to enlist in the military.

5. Equality California's membership includes several of the named and unnamed plaintiffs in the above-captioned matter, including Aiden Stockman, Nicolas Talbott, Jaquice Tate and others.

The Ban on Transgender Military Service Conflicts with Equality California's Organizational Purpose

6. The exclusion of Equality California's transgender members from military service directly conflicts with Equality California's mission, which seeks to ensure the free, full and equal participation of LGBTQ people in society. The current policy further conflicts with our mission to improve access to health care for transgender individuals.

7. The ban on military service by transgender individuals directly harms both our members who currently serve and those who hope to serve in the United States military. By branding transgender people unfit to serve in the military, the ban encourages bias toward transgender people, affects their status within the broader community, compromises their ability to pursue careers – either in or out of the military – and demeans the contributions that transgender service members have made through their military service.

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

Dated: September 30, 2017

Rick Zbur
Executive Director, Equality California