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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 TAMASYN
REEVES IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

1 I, Tamasyn Reeves, declare as follows:

2 1. I am 29 years old and I live in California. I come from a military
3 family. My whole life, I have wanted to serve in the United States Navy. I am
4 transgender.

5 **Background**

6 2. Ever since I was a child, I wanted to serve in the United States
7 military. I grew up with my grandfather telling me stories of his time in the Navy,
8 serving aboard the U.S.S. Kiersarge during the Korean War. He told me about his
9 time spent on ship and in Japan, and the bonds that he forged with his fellow
10 sailors. I always felt connected to him and his stories.

11 3. My family is a military family. In addition to my grandfather's
12 service in the Navy, several of my uncles served in the Air Force and several of my
13 cousins served in the Navy. As a child I thought that, when the time came, I also
14 would serve my country.

15 **Attempts to Enlist in the Military**

16 4. In 2010, I tried to enlist in the military. I had just started college. At
17 the time, I knew almost nothing about what it meant to be transgender. I knew I
18 was different, but I did not know the words to express how I felt. Without the
19 proper terminology, the best I could do was tell other people that I was gay. The
20 word told people that I was different, but still did not accurately describe how I
21 really felt.

22 5. I spoke with a recruiter, hoping to enlist in the Navy. I was open with
23 the recruiter. I told him that I felt different and that I identified as gay. The
24 reaction scarred me. Not everyone in my life had supported me, but they had not
25 reacted like this. The recruiter told me that I could not serve – not because I was
26 not qualified, but because I was different. At the time, the “Don’t Ask, Don’t Tell”
27 policy prohibiting open service by LGBTQ individuals had not yet been repealed.

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1 I was heartbroken. Serving in the Navy had felt like a duty that I needed to fulfill,
2 and I was worried that opportunity would be denied to me forever.

3 **Coming Out and Transitioning**

4 6. In a college course in 2011, I learned what it meant to be transgender.
5 Things clicked, and I almost instantly understood how and why I had felt different
6 for so long. Within two weeks, I had started living openly as a woman. I came out
7 to my colleagues, teachers, and friends in college. Within a year, I came out to my
8 family. A year after that, in 2012, I began taking hormones to start my medical
9 transition.

10 7. At that time, I felt like I was on the right path, and finally living as
11 who I am. But I also knew that I faced a barrier to fulfilling my longstanding goal
12 of military service. I realized that even though Congress recently had repealed
13 Don't Ask, Don't Tell, I would not be permitted to serve in the Navy because
14 repealing Don't Ask, Don't Tell still did not lift the ban on open service by
15 transgender individuals.

16 **The Ban is Removed and Reinstated**

17 8. In June 2016, I learned from a friend who is a veteran of the Air Force
18 that the ban on open military service by transgender people was being lifted, and
19 new inclusive policies permitting open service and enlistment were being
20 implemented. I first felt relieved, and then felt elated. Finally, after waiting and
21 hoping for so long, I would be able to enlist.

22 9. I considered enlisting as soon as the new policies regarding enlistment
23 were put into place. But, I also knew how close I am to earning my degree in
24 psychology. I researched my options and learned that having a college degree
25 could increase my chances of obtaining an officer position upon enlistment. I
26 decided to earn my degree first and then apply after the new policy had been fully
27 implemented.

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1 10. However, in July 2017, I learned that President Trump, through a
2 series of tweets, announced that the June 2016 policy would not be implemented,
3 and transgender people would continue to be shut out of the military. My heart
4 sunk. I felt upset, frustrated, and angry. It was as if someone told me that I was
5 not good enough, that I was not worthy to serve my country as so many of my
6 family members had.

7 11. In August 2017, President Trump issued a memorandum officially
8 directing the Department of Defense to reinstate the ban on military service by
9 transgender people. I feared that I would never be permitted to be myself and also
10 serve my country, as so many of my family members have proudly done.

11 **Current Status**

12 12. If the ban were lifted today, I immediately would go to a recruiter to
13 discuss enlisting in the United States military upon receipt of my degree, expected
14 in Spring 2018. Military service, most likely in the Navy, continues to be my
15 steadfast goal.

16 13. I do not know what job, if any, I will find after graduating college.
17 Until the ban was issued, I had planned on serving in the military upon graduation.
18 I knew that enlisting in the military would provide a stable job, a steady income,
19 health benefits, and a chance at retirement or the option to return to civilian life
20 with the benefit of military service on my resume. Now, I face an uncertain future,
21 having none of that.

22 14. In addition to limiting my future ability to serve in the military, I
23 worry about how the President's ban on military service by transgender people
24 will affect my civilian career. Transgender people face significant discrimination
25 in employment already. The government has now said that I am unfit to serve in
26 the United States military. Because of this, I fear that civilian employers similarly
27 will think that I am unfit to hire.

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1 15. I do not understand why people who are motivated and otherwise
2 qualified to serve in the military are being prohibited from doing so. Over the time
3 that I struggled with and ultimately became comfortable with my own gender
4 identity, I saw progress in the world around me, and how people reacted to those
5 who are seen as different. But now I fear that people who dislike me simply
6 because I am transgender have been emboldened.

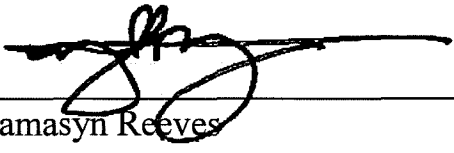
7 16. Being singled out in this way by the President of the United States and
8 by the U.S. Armed Services sends a devastating message that transgender people
9 are somehow inferior to other people. In effect, it is an invitation to discriminate.
10 I am deeply concerned that being stigmatized by the government will have a
11 negative impact on many aspects of my life, from how others see me to my
12 prospects for employment and advancement in a professional career.

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

Dated: September 26, 2017



Tamasyn Reeves