

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

| | | |
|--------------------------|---|-----------------------------------|
| BROCK STONE, et al., |) | |
| |) | |
| <i>Plaintiffs,</i> |) | |
| |) | |
| v. |) | Civil Action No. 17-cv-2459 (MJG) |
| |) | |
| DONALD J. TRUMP, et al., |) | |
| |) | |
| <i>Defendants.</i> |) | |

**DECLARATION OF DEBORAH LEE JAMES IN SUPPORT OF
PLAINTIFFS’ OPPOSITION TO DEFENDANTS’ MOTION FOR CLARIFICATION
AND, IF NECESSARY, A PARTIAL STAY OF PRELIMINARY INJUNCTION
PENDING APPEAL**

I, Deborah Lee James, declare as follows:

1. As noted in my previous declaration in this case signed and dated October 21, 2017, I served as the Secretary of the United States Air Force (“USAF”) from December 20, 2013 to January 20, 2017. As Secretary, I was responsible for supervising the Department of the Air Force’s participation in a working group convened by the Department of Defense in 2015 to identify the practical issues related to transgender Americans serving openly in the Armed Forces, and to develop an implementation plan that addressed those issues with the goal of maximizing military readiness (the “Working Group”). On June 30, 2016, then Secretary of Defense Ashton Carter announced that the military would allow transgender people to openly serve. Included within that announcement and change of policy was a direction that the military would adopt changes to the accessions policy to begin allowing accession by transgender people starting on July 1, 2017.

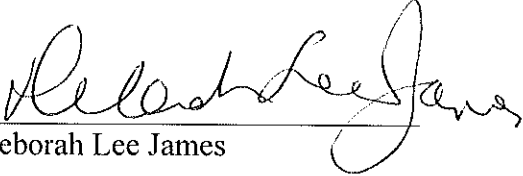
2. Based on my personal knowledge, the USAF had nearly completed the necessary preparations for implementing the change in accessions policy when I left office in January 2017.

3. The change in accessions to authorize transgender people to serve was consistent with the approach generally for authorizing people to serve with curable or treatable medical conditions. It included notifying and training medical personnel across the services regarding information relating to the underlying medical condition associated with some transgender individuals and the period of stability after treatment necessary for enlistment.

4. The preparations for implementing the change in policy could readily have been completed by the initial target date of July 1, 2017, well within the current target date of January 1, 2018.

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

DATED: December 13th, 2017


Deborah Lee James