

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

BROCK STONE, et al.)	
)	
Plaintiffs,)	
v.)	Case No. _____
)	
DONALD J. TRUMP, et al.)	
)	
Defendants.)	
)	

DECLARATION OF CHASE STRANGIO IN SUPPORT OF MOTION FOR PERMISSION FOR PLAINTIFF JOHN DOE TO PROCEED UNDER PSEUDONYM, AND TO OMIT INDIVIDUAL PLAINTIFFS' ADDRESSES FROM CAPTION

I, Chase Strangio, depose and say as follows:

1. I am a staff attorney with the LGBT & HIV Project of the American Civil Liberties Union, and I represent Individual Plaintiffs Brock Stone, Kate Cole, John Doe, Seven Ero George, Teagan Gilbert, and Tommie Parker in this action.
2. Through my professional and personal experiences, I have developed expertise in the societal treatment of individuals who are transgender.
3. Transgender individuals face staggering rates of harassment and violence, and are more likely to experience discrimination and stigma than other individuals.
4. Attached hereto as **Exhibit A** is a true and correct copy of certain portions from the "2015 U.S. Transgender Survey" published by the National Center for Transgender Equality in December 2016, which reflects the high rates at which transgender individuals face harassment and violence.
5. Attached hereto as **Exhibit B** is a true and correct copy of certain portions from "A Crisis of Hate: A Mid Year Report On Lesbian, Gay, Bisexual, Transgender, and Queer Hate Violence Homicides" published by the National Coalition of Anti-Violence Programs in August

2017, which describes the high rates at which men and women who are transgender and other gender non-conforming individuals face violent homicide.

6. In addition to continuing harassment and violence against transgender individuals, the United States is currently experiencing an increase in violence motivated by bias and political disagreements.

7. As a result of these factors, Individual Plaintiffs would face a significant risk of retaliation, harassment, and violence if their home addresses were publicly filed in connection with this litigation against President Trump.

8. There are particularly high rates of discrimination against transgender individuals in southern states like Arkansas and Texas. During the 2017 legislative session, lawmakers in Arkansas and Texas considered a slate of bills targeting transgender individuals for discrimination. The bills themselves and the debate surrounding them, exposed extensive hostility toward and fear of transgender individuals in those states.

9. To highlight the type of legislation that has been introduced in states across the country, attached hereto as **Exhibit C** is a true and correct copy of “A perfect storm of hate: These Republican bills in Arkansas would make it ‘illegal to be transgender’”, published by Salon.com in March 2017, which details the Arkansas senate bill requiring people to use restrooms corresponding with the gender assigned to them at birth; the Arkansas house bill intending to expand indecent exposure laws to target transgender individuals’ restroom use; and the Arkansas house bill targeting the restroom use of transgender students in public schools.

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

Executed this 28th day of August, 2017.


Chase Strangio