

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

Brock Stone, et al.,

Plaintiffs,

v.

Donald J. Trump, et al.,

Defendants.

Case No. 1:17-cv-02459-MJG

**DECLARATION OF TEDDY D'ATRI**  
**IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS'**  
**MOTION TO DISSOLVE THE PRELIMINARY INJUNCTION**

I, TEDDY D'ATRI, hereby declare:

1. The facts set forth in this declaration are based on my personal knowledge.

**Personal Background Information**

2. I am twenty-one years old. I currently work at an electronics store as a sales associate.
3. I am a man.
4. I am transgender.
5. I disclosed my transgender identity to my family and friends in 2017.
6. I began undergoing hormone therapy as a medically-necessary part of my gender transition in August 2017. I understand that I received a diagnosis for gender dysphoria around that time. I am currently pursuing medically-necessary top surgery in connection with my gender transition. I am tentatively scheduled to undergo that procedure in August 2018. I do not anticipate requiring any further surgical care in connection with my gender transition after that.

7. I am in the process of updating my civilian records to accurately reflect my gender. I have begun working on the paperwork to update my gender with the Department of Motor Vehicles and Social Security Administration, and intend to complete this process in the coming months.

8. I am in the process of enlisting in the United States Air Force, where I hope to work as an aerial gunner or in the security force. I first met with a recruiter in July 2017. Due to confusion and uncertainty on the part of certain recruiters created by the Transgender Service Member Ban, my initial efforts to pursue enlistment reached an impasse and I switched recruiters in October 2017. I have stepped up my efforts to work through the recruitment process since the accessions ban was lifted in January 2018.

9. I have several reasons for joining the Air Force. Above all else, I want to serve and protect my country and the people I care about. Related to that is my desire to be part of something greater than myself, and work for the greater good. Finally, I come from a family with a proud tradition of military service. Both my father and my grandfather served in the Army. I want to follow their example.

#### **Effect of Transgender Service Member Ban**

10. Under the 2016 Open Service Directive currently in effect, I understand that I will be eligible to enlist as early as August 2018. I have been advised by my recruiter that I am eligible to receive a waiver to shorten the 18-month time periods regarding stability and medical care.

11. I have been working to enlist since the accessions ban was lifted at the beginning of this year, with the goal of enlisting in August 2018.

12. However, under the terms of the Implementation Plan prepared by the Department of Defense in February 2018, I would be disqualified from military service because I have been

diagnosed with gender dysphoria, I have undergone gender transition, and I intend to undergo surgery related to gender transition.

13. The Ban on military service by transgender individuals thus directly threatens my career because it will prevent me from enlisting. This will damage by personal and financial future, as it will deny me the opportunity to serve my country, follow my father's tradition of military service, and prevent me from pursuing my desired career in public service. If I am able to enlist, my intent is to sign an eight-year contract, and ideally stay in the military for my career. Losing this opportunity would be a significant personal and career loss.

14. The Ban has also created personal anxiety and uncertainty for me. I feel as though my service is being rejected. All I want to do is serve my country, but it seems like that simple goal is being made extremely difficult.

15. I have structured my life around trying to join the military. If I were not able to do so, I would have to consider a back-up plan. One way or another I want to work in public service. If I am not able to join the military, I would likely pursue a career in law enforcement or substance abuse counseling. But my first goal is to join the military.

16. In my current job, I have interacted with a number of veterans and reservists. In my experience, none of them care about my transgender identity. All that matters to them is that I want to serve my country and do an important job. It is extremely frustrating and disheartening to see the Ban potentially stand in my way of doing exactly that.

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

Executed on the 22 day of April, 2018 in Smithfield, RI.



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TEDDY D'ATRI