

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

EMANI LOVE, et al.

Plaintiffs,

v.

RUTH JOHNSON, in her official capacity as
the Secretary of State of Michigan,

Defendant.

Case No. 15-cv-11834

Hon. Nancy G. Edmunds

Mag. Elizabeth A. Stafford

**PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANT'S
MOTION FOR A PROTECTIVE ORDER**

Plaintiffs, by and through their undersigned counsel, hereby respond to Defendant's Motion for a Protective Order and Request for Immediate Consideration ("Defendant's Motion") (Dkt. # 49). For the following reasons, the Court should deny Defendant's Motion.

Background

This case concerns Defendant Secretary of State Ruth Johnson's policies for correcting the sex designation on transgender individuals' driver's licenses or personal identification cards ("IDs") and the reasons for implementing those policies.

Defendant Ruth Johnson's office changed the policy for correcting the sex designation on a Michigan ID for transgender individuals just slightly more than

two and a half months after she took office as the Secretary of State of Michigan. The new policy required a transgender person to produce an amended birth certificate reflecting the person's gender. This policy change made it literally impossible for many transgender individuals, such as those born in states where the sex designation on a person's birth certificate cannot be amended, to correct their sex designation. For others, it was extremely burdensome or practically impossible, because their state of birth requires a transgender person to have prohibitively expensive or medically unnecessary surgery, or obtain a court order in a state where they no longer lived, to amend the sex designation on their birth certificate.

The genesis of this policy appears to be the 2010 Republican primary election when Defendant Johnson was running for Secretary of State. Her primary opponent, Paul Scott, criticized a 2005 decision of a previous Secretary of State to allow gender changes on transgender persons' driver's licenses without undergoing surgery and stated that ensuring that transgender individuals would never be allowed to change the sex designation on their IDs would be a priority of his administration. *See, e.g.,* Troy Reimink, *Secretary of State Candidate Paul Scott Campaigns Against Changes on ID for Transgender Individuals* (Jan. 21, 2010), available at http://www.mlive.com/news/grand-rapids/index.ssf/2010/01/secretary_of_state_candidate_p.html (last visited March

31, 2016). The Campaign for Michigan Families requested Defendant Ruth Johnson's views on the issue whether transgender individuals should be allowed to change the sex designation. *See* Exh 1. In an August 20, 2010 email to the Campaign for Michigan Families, Defendant Johnson responded that transgender individuals should never be allowed to change the sex designation on their licenses or PIDs. *Id.* In particular, she declared: "I do not support allowing people to change their gender on their license as a result of surgery or lifestyle." *Id.*¹

The March 2011 policy change requiring an amended birth certificate is a clear reflection of Defendant Johnson's campaign promise to not allow transgender individuals to change the sex designation on their IDs. For transgender individuals born in states that do not allow changes to birth certificates or that require unnecessary surgery, it became impossible to change the gender on an ID. For other transgender individuals, amending their birth certificate was a significant and costly burden, involving expensive surgical procedures or traveling to one's birth state to petition for a court-ordered gender change. For anyone who was able to change the sex on their license, Defendant Johnson could place the blame on the Michigan legislature for passing a law that allowed gender changes on birth certificates. No longer could she be criticized for putting into place a policy that

¹ In the email, Johnson went on to state that she did not support adding "gender identity" to the protected classes of the Elliott-Larsen Civil Rights Act, nor to the state hate crimes law. *Id.*

made it easy to change the sex designation on a transgender person's license. Thus, the 2011 policy closely aligned with the position Defendant Johnson had personally adopted during her political campaign.

Ms. Johnson, through counsel, has attempted to distance her involvement in the policy change to require an amended birth certificate. For example, Defendant has stated that Secretary Johnson was not "*directly*" involved in the development, implementation, or approval of the policy and that "there is no evidence that the Secretary participated in any way in the *drafting* of the policy." *See, e.g.*, Defendant's Motion at 3, 4 (emphasis added). Her suggestion that she did not put pen to paper to draft the actual policy requiring an amended birth certificate does not answer the question whether she suggested reasons for the existing policy to be reviewed or revised or approved that change

Ms. Johnson's statement that "all information so far [] shows that the challenged policy was developed by lower level staff," Defendant's Motion at ¶ 5, also fails to address whether her actions or campaign promises were the reasons why the new policy was developed. Johnson may have communicated her campaign position regarding transgender individuals' ability to correct the sex designation on their IDs to the Secretary of State staff members, who then "developed" the policy in accordance with her wishes or directives. Defendant Johnson's job, by statute, is to be responsible for implementing rules regarding

documentation acceptable for obtaining and renewing an ID, Mich. Comp. Laws §§ 28.291(1), 257.307(1). As a result, she is responsible for changes to the policy to correct the sex designation on an ID, even if she had not been the first to suggest the 2011 policy change.

Indeed, there is now evidence that Defendant Johnson herself was involved with the policy change and the reasons for it. For example, Defendant's Rule 30(b)(6) representative, Michael Wartella, who is also the Director for the Michigan Customer Services Administration, testified in his deposition that Defendant Johnson, through her secretary, requested a meeting with him soon after she took office to discuss the policy for transgender people to change the gender on a driver's license. He testified that in that meeting, Johnson asked about the existing policy, and he told her about upcoming changes to the policy. She asked whether surgery would be required under the new policy to change the gender on a license, and he confirmed that it would be.² Johnson then expressed approval of the change. Mr. Wartella further testified that no change would be made to the policy, such as one that would align it with the federal government's policy or

² Mr. Wartella's deposition took place March 31, 2016, so Plaintiffs' counsel does not yet have a transcript to provide to the Court. However, they will submit relevant pages from the transcript to support their statements regarding Mr. Wartella's deposition as soon as that transcript is available to supplement this response.

those adopted by many other states, absent a specific “request from the Johnson administration” or a specific legislative enactment.

Documents produced in this case also refer to Johnson’s personal involvement. A January 10, 2012, letter to Jay Kaplan from Michael Wartella states that “Secretary Johnson has asked that I respond on her behalf” regarding the justifications for the policy requiring an amended birth certificate in order to change the sex designation on a driver’s license or PID. *See* Exh. 2. The Secretary of State herself was carbon copied on the letter. *Id.*

More recently, Defendant’s counsel has represented to the Court that, by making changes to the policy challenged by Plaintiffs in their complaint, “Ruth Johnson has remedied any constitutional violation” and “Ruth Johnson will accept a passport or passport card issued by the federal government” to change the gender on a Michigan driver’s license. Def.’s Mot. for J. on the Pleadings, Dkt. # 48, at Pg ID 462. Not only does this indicate that Ms. Johnson continues to be personally involved in making and implementing the policy at issue in this case, it also reflects her continued commitment to her personal campaign promise not to allow “surgery or lifestyle” to dictate gender changes on Michigan drivers’ licenses. Although Johnson could have adopted a rational policy that allows transgender individuals to correct their Michigan ID directly by providing her office with confirmation of their correct gender from a healthcare provider, her purported new

policy requires transgender people to first obtain a passport from the federal government before obtaining correct identification from the state. Thus, just as Johnson could previously blame the Michigan legislature for allowing gender changes, now she can blame the federal government for doing so. In sum, Ruth Johnson's personal campaign pledge continues to play an essential evidentiary role in this case.

Argument

Plaintiffs should be permitted to depose Defendant Ruth Johnson regarding the meaning of her campaign promise to not allow transgender people to change the gender on their license and the connection between that statement during her campaign and the 2011 policy change. Defendant Johnson is the only one who can provide information as to why and how she came to her campaign position that transgender individuals should not be allowed to change the sex designation on their IDs and how her campaign policy position impacted her decision to implement the amended birth certificate policy, which occurred just after she took office.

Plaintiffs have deposed all witnesses disclosed by Defendant to have knowledge of the 2011 policy change, and none of them admitted to knowing about Defendant Johnson's campaign statements regarding gender changes on driver's licenses. Johnson was not even listed as a person with knowledge, even

though Mr. Wartella's testimony shows she was aware of the change before it went into effect. Mr. Wartella further admitted that neither Johnson, nor her chief of staff, Mike Senyko, were asked to provide documents or other information that would be responsive to Plaintiffs' interrogatories and requests for production.

Additionally, Defendant Johnson is the only one who can confirm that her campaign promise continues to influence the bizarre nature of the policy changes that her counsel have recently announced to the Court in an effort to have the case dismissed as moot. In sum, Johnson's knowledge regarding her campaign-related motivations for changing the policy is information that no else at the Department of State other than her is likely to be able to provide. A court "may permit depositions of high ranking officials where the official has first-hand knowledge related to the claim being litigated," as long as "it is shown that other persons cannot provide the necessary information." *Turner v. City of Detroit*, No. 11-12961, 2012 U.S. Dist. LEXIS 146416, at *6 (E.D. Mich. Oct. 11, 2012) (citations omitted) (allowing the deposition of Detroit Mayor Dave Bing on the grounds that he had "knowledge of the pertinent facts related to claims and may have unique information").

Many courts have allowed the head of a government agency or department to be deposed. *See, e.g., Turner, supra; Hadix v. Caruso*, No. 4:92-cv-110, 2007 U.S. Dist. LEXIS 48955 (W.D. Mich. July 6, 2007); *Murry Energy Corp. v.*

McCarthy, No. 5:14-CV-39, 2015 U.S. Dist. LEXIS 152914 (N.D. W. Va. Nov. 12, 2015) (denying the defendant's motion for a protective order regarding the deposition of the EPA administrator in a case involving the EPA's enforcement of a statute); *Energy Capital Corp. v. United States*, 60 Fed. Cl. 315 (2004) (granting plaintiff's motion for leave to take the deposition of former Secretary of Housing and Urban Development because he had personal knowledge of information relevant to the claims at issue, evidenced by statements he made); *State ex rel. Summit County Republic Party Executive Committee v. Brunner*, 117 Ohio St. 3d 1210 (Ohio 2008).

In *Hadix, supra*, the court denied the Michigan Department of Corrections Director's motion for a protective order regarding her deposition, as it was "likely" that she, as the head of that Michigan government department, had "direct and unique knowledge" on the subject of the decision to close a prison facility, which was at issue in that case. *Id.*, 2007 U.S. Dist. LEXIS 48955 at *5-6. The court stated that "[t]here exists the likelihood of relevant firsthand knowledge," as the decision to close a prison was "logically within the purview of [the Director's] position (therefore putting her in the position of having unique knowledge of the issues)." *Id.* at *4-*5. The court specifically rejected the defendant's argument that other, lower-ranking officials could provide information relating to the prison closure in place of MDOC's director, reasoning that those lesser ranking officials

were ““tasked with the day-to-day operations of MDOC’s medical health care and financial activities,”” whereas the closure of a prison facility did not fit within that category. *Id.* at *6.

Similarly, in *State ex rel. Summit County Republic Party Executive Committee v. Brunner*, 883 N.E.2d 452 (Ohio 2008), the Ohio Supreme Court denied the defendant Secretary of State’s motion for a protective order to prevent her deposition related to her decision to appoint a person to the elections board who was not recommended by the plaintiff committee. The court found that “notwithstanding the secretary’s claim to the contrary,” the plaintiff’s “claims challenge a decision of the secretary herself and not some lower-level employee in her office.” *Id.* at 453. The Secretary’s “reason to believe” that the person recommended by the committee was incompetent, and her “personal knowledge and thought process in arriving at her decision” were relevant issues “at the heart of the case” that “[n]o one else can answer.” *Id.*

The logic of *Caruso* and *Brunner* applies with equal force here. The 2011 policy change at issue in this case was “logically within the purview” of Defendant Johnson, “therefore putting her in the position of having unique knowledge of the issues.” *Caruso*, 2007 U.S. Dist. LEXIS 48955 at *4-*5. In light of the campaign promises made personally by Johnson just months before she took office and changed the policy, the meaning of her personal campaign position and the role it

played in the policy change are relevant and likely known only to her. In other words, Johnson's "personal knowledge and thought process in arriving at her decision lies at the heart of the case" and are responsive to questions that "[n]o one else can answer." *See Brunner*, 883 N.E.2d at 453. Further, the lower-level officials' job duties at the Secretary of State's Office involve more day-to-day tasks such as implementing the policy that she sets. At the end of the day, it was Defendant Ruth Johnson's responsibility to set policy on this issue, and there is ample evidence that she did so. As confirmed by the deposition testimony of the persons Defendant identified as having knowledge of why the 2011 policy was created, the role that that Defendant's political campaign promises played in that decision is not information that Plaintiffs can obtain from lower level civil servants who work as her government employees.

The authorities cited in Defendant's Motion are distinguishable from the situation here. For example, in *Fitzpatrick v. Secretary of State*, 176 Mich. App. 615 (1989), it was clear that the high-ranking government official did not have relevant personal knowledge because the official signed an affidavit stating as much. In this case, Defendant has offered no evidence, and certainly not an affidavit signed by Johnson, stating that she had no involvement in the policy changes at issue in this case. The evidence indicates the contrary is true.

Similarly, in *In re United States*, 197 F.3d 310 (8th Cir. 1999), and *Deukmejian v. Superior Court*, 143 Cal. App. 3d 632, 635 (1983), it was clear that the testimony of the high-ranking officials in question was not pertinent to the plaintiffs' claims. In this case, by contrast, evidence regarding Defendant Johnson's personal involvement in setting policies regarding how to correct the sex designation on an ID are essential to the claims in this case, and Defendant Johnson has unique information regarding that evidence.

Moreover, other cases cited in Defendant's Motion are distinguishable because the party seeking the deposition did not exhaust other discovery means, which could provide an alternative way of getting the information, such as interrogatories. *See, e.g., Jameson v. Oakland Cnty.*, No. 10-10366, 2011 U.S. Dist. LEXIS 6312, at *4 (E.D. Mich. Jan. 24, 2011) (finding that the deposition of the sheriff "may become necessary in the future," after deposing lower-level officers); *Jackson v. City of Detroit*, No. 05-74236, 2007 U.S. Dist. LEXIS 55730, at *10 (E.D. Mich. Aug. 1, 2007) (allowing the plaintiff to further petition the court to depose the government official "[f]ollowing the utilization of alternative discovery tools"); *Hamed v. Wayne Cnty.*, 271 Mich. App. 106, 111 (Mich. Ct. App. 2006) (holding the plaintiff had failed to establish that information could not be obtained from "any other discovery source or mechanism," as depositions of lower level officials were not conducted and written interrogatories were not

submitted); *see also* Def. Mot. at 5, 12. Furthermore, another case cited in Defendant's Motion involved the situation in which the high-ranking official did not have unique knowledge, not shared by others. *See, e.g., In re Bush*, 287 S.W.3d 899 (Tex. App. Ct. 2009); *see also* Def. Mot. at 7.

However, here, Plaintiffs have already conducted depositions of all individuals listed as having knowledge from Defendant's interrogatory responses, who were the lower-level officials at the Secretary of State's office. Plaintiffs have also received answers to their written interrogatory requests. The information gained during this discovery has not been sufficient to determine how Defendant Johnson's campaign positions influenced the Secretary of State's policy to require an amended birth certificate to change the sex designation on an ID and her reasons for such a policy and position. Only Defendant Johnson has such unique information.

In essence, Defendant's counsel are attempting to shield her from being deposed in this case because she is a high-ranking government official. This case, however, concerns the constitutionality of a policy that Defendant likely played a role in establishing. Because Defendant made a political campaign promise about that policy and has shaped the policy accordingly, it is not sufficient to obtain information about the reasons behind the policy exclusively from lower-ranking government employees who are not themselves the ones statutorily responsible for

establishing the policy. The proper deponent to obtain such information is the Defendant herself.

Conclusion

Defendant's Motion for a protective order should be denied.

Dated: March 31, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically using the Court's ECF system, which will provide electronic notice to all counsel of record.

Dated: March 31, 2016

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**UNITED STATES DISTRICT COURT
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INDEX OF EXHIBITS

Exhibit 1: August 20, 2015 email from Ruth Johnson to Campaign for Michigan Families

Exhibit 2: January 10, 2012 letter from Michael Wartella to Jay Kaplan

Exhibit 1

NEWS -- Sec. of State race: Ruth Johnson joins Rep. Paul Scott in opposing sex change on driver's licenses

AFAM at chartermi.net [AFAM at chartermi.net](http://AFAM.at/chartermi.net)

Fri Aug 20 16:02:52 CDT 2010

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CAMPAIGN FOR
MICHIGAN FAMILIES
3800 East Monroe * Midland, Michigan 48642

FOR IMMEDIATE RELEASE: Friday, Aug. 20, 2010
CONTACT: Gary Glenn, Chairman 989-430-0652

Former Rep. Ruth Johnson joins fellow GOP Sec. of State hopeful Rep. Paul Scott in stating opposition to sex changes on driver's licenses

Former House member also opposes homosexual "marriage," adoption, "gay rights" laws

"In an era of identity theft and national security concerns, we're glad that Ruth Johnson has now joined Rep. Paul Scott in expressly stating her opposition to the Secretary of State policy of allowing men to falsely identify themselves as female on their state-issued driver's license, and vice versa," said Campaign for Michigan Families chairman Gary Glenn. "The people of Michigan should at minimum be able to trust their state government to tell the truth, not enable certain individuals' psychological and emotional delusions by officially and legally identifying them as something they biologically are not. We urge all candidates for Secretary of State to let voters know where they stand on this honesty-in-government issue."

The Associated Press reported in February: "Scott said he 'didn't raise (the issue). Secretary Land raised it when she temporarily changed the policy in 2005.' In his announcement letter, though, Scott writes: 'I will make it a priority to ensure transgender individuals will not be allowed to change the sex on their driver's license in any circumstance.' Scott, a first-term lawmaker, doesn't consider raising the issue a political ploy. 'My personal belief is you are who your DNA says you are, regardless of what surgical procedures you may have thereafter,' he says."

http://www.woodtv.com/dpp/news/local/capitol_region/MI_SOS_candidates_make_gender_an_issue

Friday, in response to questions submitted by the Campaign for Michigan Families, Republican Secretary of State candidate Ruth Johnson joined Scott in saying she opposes allowing men to have their driver's license altered to legally identify them as female (and vice versa). Johnson also expressed her opposition to homosexual "marriage," allowing homosexual couples to adopt children in the state, and to adding homosexual behavior ("sexual orientation") or cross-dressing ("gender identity") as specially protected classes under the state's non-discrimination and "hate crime" laws.

She also disavowed homosexual activists' endorsement of a previous campaign eight years ago. In 2002, as a Republican state House of Representatives candidate, Johnson was endorsed by the Triangle Foundation's Pride PAC, the aggressively partisan homosexual activist group based in Detroit which that same year endorsed 80 Democrats, eight Greens, and only four Republicans in the entire state (including Johnson). <http://web.archive.org/web/20030409040543/www.pride-pac.org/e/mihouse.htm>

According to a Pride PAC news release that year, "Endorsements are based on several criteria including responses to questionnaires, their record on GLBT issues, and viability as a candidate. Each candidate was surveyed on issues ranging from hate crimes, civil rights, parenting, family, youth and military issues, and HIV/AIDS policy." <http://web.archive.org/web/20021206065436/pride-pac.org/n/Primary+Slate+Release+2002.htm>

In 2004, however, then-Rep. Johnson voted in favor of the Marriage Protection Amendment which constitutionally defines marriage in Michigan as only between one man and one woman.

Johnson's e-mail responding to the Campaign for Michigan Families' questions follows below, with Johnson's responsive comments appearing in bold red.

----- Original Message -----
From: [rj4mi at comcast.net](mailto:rj4mi@comcast.net)
To: Campaign for Michigan Families
Sent: Friday, August 20, 2010 2:33 PM
Subject: Re: Triangle Pride PAC endorsement of Ruth Johnson

Gary,

Thanks for giving me an opportunity to address these issues. I have answered your questions below. If there is any further concerns, feel free to contact me.

Please specifically state your position on the following:

1. In an era of identity theft and national security concerns, do you believe men should be able to have their state-issued driver's license legally identify them as females (and vice versa), and if so, under what circumstances? (Current state policy is that a man who has had his genitals surgically removed can have his license changed to falsely identify him as a female. Homosexual activists believe even men who have not had such surgery, but who claim to consider themselves female, should be able to have their license changed to female, a policy which Sec. Land's office, amazingly, actually approved in March 2005, then rescinded a month later. The Michigan ACLU will call on the next Sec of State to reinstitute the latter policy.)

No I do not support allowing people to change their gender on their license as a result of surgery or lifestyle.

2. Do you support legalizing adoption by homosexual couples in Michigan?

No

3. Do you support adding the terms "sexual orientation" and/or "gender identity" as protected classes under the Elliott Larsen Act?

No

4. Do you support adding those terms to the state "hate crimes" law?

No

5. Will you oppose any attempt to repeal or amend Michigan's Marriage Protection Amendment?

Yes

6. So that there's no confusion on the subject, do you disavow and renounce Triangle Pride PAC's endorsement of your legislative candidacy in 2002?

Yes

Thanks,

Ruth Johnson

----- next part -----

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Exhibit 2



STATE OF MICHIGAN
RUTH JOHNSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

January 10, 2012

Mr. Jay Kaplan, Staff Attorney
American Civil Liberties Union of Michigan
2966 Woodward Avenue
Detroit, MI 48201-3035

Dear Mr. Kaplan:

Thank you for writing Secretary of State Johnson regarding the Michigan Department of State's policies and procedures for individuals wishing to change the gender on their Michigan driver license or state personal identification card (PID). Secretary Johnson has asked that I respond on her behalf.

Michigan statute MCL 333.2831 (c) states, "The state registrar shall establish a new certificate of birth for an individual born in this state when the registrar receives the following: A request that a new certificate be established to show a sex designation other than that designated at birth. The request shall be accompanied by an affidavit of a physician certifying that sex-reassignment surgery has been performed."

Currently a certified birth certificate is the only document accepted by the Department to change the gender on a driver license or PID due to sex reassignment surgery. Implementation of the Department's current procedures is based on MCL 333.2831 that instructs the state registrar to issue an amended birth certificate when reassignment surgery was completed.

In November 2011, the American Association of Motor Vehicle Administrators (AAMVA) surveyed states on their transgender policy requirements when issuing a driver license or identification card. AAMVA received responses from 37 states and 5 Canadian provinces/territories. The survey responses indicated that to change the gender on a driver license or PID:

- 26 states require an amended birth certificate, a court order, and/or medical certification verifying the reassignment surgery was completed.
- 16 states require a medical certification verifying the applicant was undergoing gender transition treatment, proof the reassignment surgery was completed, a court order, or an amended birth certificate.

Your letter noted that Idaho, Mississippi, Ohio, Oklahoma, South Carolina, and Tennessee do not permit gender changes on birth certificates under any circumstances. We reviewed the websites for these states vital records agencies and found:

- Idaho implemented legislation on July 1, 2010 for amending vital records (I.C. §39-278). The statute allows an applicant to petition an Idaho court for an order establishing the facts necessary to establish or amend a vital record.
- With a court-ordered gender change, Mississippi will add the gender reassignment information to the birth certificate as a marginal notation.

January 10, 2012

- Ohio allows for changes to their vital records depending on the type of correction or change. An Affidavit Correction of Birth Record form is required and subject to review and approval by authorized staff.
- Oklahoma allows for changes to their vital records, which may require a court order. Any amendments are subject to the review and consideration by authorized staff.
- South Carolina allows for changes to their vital records subject to review and approval by authorized staff. *Note:* The ACLU indicates the vital records agency will attach a card to the birth certificate noting the reassignment change, but not issue a revised birth certificate with a new gender marker.
- Tennessee law does not allow for amending a birth certificate due to gender reassignment surgery.

Based on the information found, most of these states do have policies and procedures in place to obtain an amended birth certificate, which may include noting the completion of reassignment surgery on a birth record or attaching a card to the birth certificate.

Your letter also indicated Illinois and Kentucky rejected requests for gender changes on birth certificates if the surgery was performed outside of this country.

- The Illinois vital records website indicates they have procedures for gender reassignment surgery completed by a non-U.S. licensed physician.
- Kentucky's vital records website indicates they allow changes to their vital records subject to review and approval by authorized staff.

Illinois and Kentucky do have procedures in place providing issuance of an amended birth certificate. Rejecting some requests for amended birth certificates does not reflect on the fact that they do allow for issuing amended birth certificates following reassignment surgery.

You also indicated 13 other states require obtaining a court order to change the gender on a birth certificate and remarked on the financial hardship and time involved for a transgendered person living in Michigan who was born in one of those states. It is not the Department's intent to place any undue burden on our customers. Our goal is to provide the best customer service possible while maintaining the integrity of any document issued by the Department of State in compliance with Michigan law.

Sincerely,



Michael L. Wartella
Administration Director

/meb

c: Secretary of State Ruth Johnson
Mike Senyko