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Attorneys for Plaintiffs
 Aiden Stockman, Nicolas Talbott,
 Tamasyn Reeves, Jaquice Tate, John Does 1-2,
 Jane Doe, and Equality California

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

AIDEN STOCKMAN; NICOLAS
 TALBOTT; TAMASYN REEVES;
 JAQUICE TATE; JOHN DOES 1-2;
 JANE DOE; and EQUALITY
 CALIFORNIA,

Plaintiffs,

v.

DONALD J. TRUMP, et al.

Defendants.

CASE NO. 5:17-cv-01799-JGB-KKx

**DECLARATION OF RICK ZBUR,
 EXECUTIVE DIRECTOR OF
 EQUALITY CALIFORNIA IN
 SUPPORT OF PLAINTIFFS'
 MOTION FOR PRELIMINARY
 INJUNCTION**

1 I, Rick Zbur, declare as follows:

2 1. I am the Executive Director of Equality California, the nation's largest
3 statewide lesbian, gay, bisexual, transgender and queer ("LGBTQ") civil rights
4 organization.

5 **Equality California's Mission**

6 2. Equality California advocates locally, statewide and nationally on
7 behalf of LGBTQ individuals and other marginalized groups. Equality California
8 works to ensure that all LGBTQ individuals fully, freely and equally can
9 participate in society. Our mission includes civil rights advocacy and improving
10 health outcomes for LGBTQ people, which includes transgender people.

11 3. While Equality California has members throughout the nation,
12 Equality California primarily advocates in California, where the majority of its
13 membership resides. California has the largest population of LGBTQ people,
14 including transgender people, and has the largest population of active military
15 service members. As such, California has the largest population of transgender
16 active military service members.

17 **Transgender Members of Equality California**

18 4. Equality California counts among its members transgender individuals
19 who currently serve in the United States military. In reliance on the policy and
20 accompanying instructions announced June 2016 that specifically permitted
21 transgender troops to serve openly, some of our members came out as transgender
22 to their chain of command. Other Equality California members who are
23 transgender and are actively serving in the military opted not to come out for fear
24 of retribution and separation. Also included among Equality California's members
25 are transgender individuals who wish to enlist in the military.

26 5. Equality California's membership includes several of the named and
27 unnamed plaintiffs in the above-captioned matter, including Aiden Stockman,
28 Nicolas Talbott, Jaquice Tate and others.

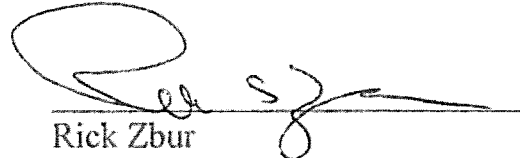
**The Ban on Transgender Military Service Conflicts with
Equality California's Organizational Purpose**

6. The exclusion of Equality California's transgender members from military service directly conflicts with Equality California's mission, which seeks to ensure the free, full and equal participation of LGBTQ people in society. The current policy further conflicts with our mission to improve access to health care for transgender individuals.

7. The ban on military service by transgender individuals directly harms both our members who currently serve and those who hope to serve in the United States military. By branding transgender people unfit to serve in the military, the ban encourages bias toward transgender people, affects their status within the broader community, compromises their ability to pursue careers – either in or out of the military – and demeans the contributions that transgender service members have made through their military service.

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

Dated: September 30, 2017


Rick Zbur
Executive Director, Equality California