

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

RYAN KARNOSKI, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 2:17-cv-01297-MJP

**DECLARATION OF CONNER
CALLAHAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

NOTE ON MOTION CALENDAR:
October 6, 2017
ORAL ARGUMENT REQUESTED

I, Conner Callahan, declare as follows:

1. My name is Conner Callahan. I am a plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.

2. I am a 29-year-old man, and I live in Asheville, North Carolina.

3. I am a Public Safety Officer at Warren Wilson College in Asheville, North Carolina.

4. I have wanted to enlist in the military since age 13. I come from a family with a legacy of military service and consider it my personal calling to serve and protect the people of the United States in this capacity.

5. I would like to put my investigative and problem-solving skills to use for the

1 military. In 2014, with the help of a U.S. Air Force recruiter in Kent, Ohio, I identified the
2 enlisted position I would like to pursue: Explosive Ordnance Disposal (“EOD”).

3 6. I am transgender. I was assigned the sex of female at birth. However, I have
4 known for many years, since approximately early 2012, that I am male.

5 7. I began living openly as male in 2014 and have done so consistently since that
6 time.

7 8. In consultation with health care professionals, I have taken clinically appropriate
8 steps to transition, which were completed in 2015.

9 9. I have taken legal steps to transition. I legally changed my first name to Conner. I
10 have changed my legal gender to male by court order. I also changed my name and gender
11 marker to male on my driver’s license and on my social security card and records.

12 10. On June 30, 2016, I learned about the ban on open transgender service being lifted
13 by the military, and also learned that there would be a path for people like me, who wanted to
14 enlist. I did internet research about the different branches and spoke with an Army recruiter in
15 Cleveland, Ohio in July 2016 because they had expressed that their branch was willing to work
16 with transgender people who wanted to enlist.

17 11. I am ready and able to pursue a military career. When I spoke with military
18 recruiters I was open about my transgender status and discussed with a recruiter what position
19 would be best for me after enlistment. I also took practice Armed Services Vocational Aptitude
20 (also known as “ASVAB”) tests, scoring above the 90th percentile on both tests.

21 12. On July 26, 2017, President Trump posted three tweets that said that transgender
22 people would not be able to serve in the military “in any capacity.”

23 13. I was utterly devastated by this news; it felt as if the floor had fallen out from
24 beneath my feet. I felt betrayed by my country and by our government. I had already sacrificed a
25 great deal in my personal life to come out as transgender, including the loss of support from my
26 then spouse and from family members. This was yet another crippling blow to my self-worth and
27 identity.

28 14. As a 29-year-old man, I have a finite amount of time left to enlist in the military.

1 It has been my life's goal and it has been difficult to try to make other plans for my future when
2 this is so clearly the best path for me. I want to serve my country and feel immense regret that I
3 have not yet been able to do so based upon illegitimate considerations.

4 15. The implementation of the ban by the Department of Defense has left me
5 despondent, despairing, and utterly hopeless. I am forced to consider a future I never saw for
6 myself: one without service to my country.

7 16. By implementing this discriminatory ban, the President of the United States, the
8 Secretary of Defense, and the Department of Defense have harmed me in serious ways.

9 17. The ban on accessions for transgender people deprives me of educational and
10 economic opportunities upon which I have relied in planning for my future. I cannot afford to
11 attain the kind of educational achievement I desire without the G.I. Bill, which is another means
12 of bettering myself and ensuring financial security.

13 18. The ban on accessions for transgender people also robs me of the opportunity to
14 foster respect and esteem with my fellow service members, chain of command, and military
15 community. Joining the military is like joining a family. The loss of such a priceless opportunity
16 not only impacts my self-confidence and ability to move forward in my life, but it also impacts
17 my future employability in the private sector.

18 19. The ban on accessions for transgender people impairs my ability to connect with
19 my friends, my family, and my community. I have shared with these people my plans to join the
20 military for so long that it has become how they see me and understand my place in the world. I
21 have heard from many of them that it causes them pain to see me so disappointed at being unable
22 to fulfill this dream. The deep shame that comes from this rejection has caused me immeasurable
23 emotional pain, the scars of which I may carry with me forever, should the ban not be lifted.

24 20. If permitted to do so, I would enlist in the military as soon as possible. Indeed, I
25 would, if I could, serve honorably in the military until the age of retirement.

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1 21. All that I want is to live openly as the man I am and to serve my country with
2 respect and dignity.

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

4
5 DATED: September 13, 2017


Conner Callahan

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States of America and the laws of the State of Washington that on September 14, 2017, I caused true and correct copies of the foregoing documents to be served by the method(s) listed below on the following interested parties:

By Hand Delivery:

US Attorney's Office
700 Stewart St., Suite 5220
Seattle, WA 98101-1271

By Registered or Certified Mail:

Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Department of Defense
1400 Defense Pentagon
Washington, DC 20301-1400

Secretary of Defense James N. Mattis
1000 Defense Pentagon
Washington, DC 20301-1000

President Donald J. Trump
1600 Pennsylvania Ave. NW
Washington, DC 20500

I hereby certify under the penalty of perjury that the foregoing is true and correct. Executed on September 14, 2017 at Seattle, Washington.

s/Rachel Horvitz

Rachel Horvitz, *Paralegal*