

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

RYAN KARNOSKI *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP *et al.*,

Defendants.

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

**DECLARATION OF
PHILLIP A. LAYMAN,
CHIEF, OPERATIONS DIVISION
OF THE AIR FORCE RECRUITING
SERVICES**

I, Phillip A. Layman, declare as follows:

1. I, Phillip A. Layman, am Chief, Operations Division of the Air Force Recruiting Services.
2. I am aware that a lawsuit has been instituted in the above-captioned case. I am aware that this case includes plaintiffs who identify as transgender and claim to have expressed interest in enlisting in the Air Force. Both plaintiffs claim to be negatively impacted by future Department of Defense policy discussed in the Presidential Memorandum for the Secretary of Defense and the Secretary of Homeland Security, dated August 25, 2017.
3. I am aware that Mr. Conner Callahan is a named plaintiff. Mr. Callahan claims that he met with an Air Force Recruiter in Kent, Ohio in 2014. I have searched the Air Force Recruiting Information Support System – Total Force (AFRISS-TF) database for any records relating to this contact. There were no matches for “Conner Callahan” in the state of Ohio. I checked other spellings of the name. My review of the records

disclosed four matches for individuals named “Connor Callahan” in the state of Ohio; however, without further information, I cannot confirm whether any of these are the same individual described in this litigation. The records I located in the AFRISS-TR system showed the following:

- a. One contact opened February 2010, listed the individual’s date of birth, high school affiliation, Ohio address and phone number. This contact was closed in May 2013.
 - b. One contact opened February 2015. No other information.
 - c. One contact opened December 2011, listed gender and date of birth. No other information.
 - d. One contact opened February 2015, listed a middle name and an email address. No other information.
4. I am aware that “D.L.” is a plaintiff. “D.L.” claims to have made contact with an Air Force Recruiter in Corpus Christi, TX. I have searched AFRISS-TF for any records relating to this contact. My review of the records disclosed two records matching the same individual with the initials “D.L.” in Corpus Christi, TX; however, without further information, I cannot confirm whether this is the same individual described in this litigation. The individual located on the AFRISS-TR system made contact with a recruiter in October 2012 and the contact was closed in August 2013 due to the individual’s stated intention to attend college.
5. In accordance with the interim guidance laid out in the memorandum entitled *Military Service by Transgender Individuals—Interim Guidance*, issued by Secretary of Defense James N. Mattis on September 14, 2017, the procedures set forth in Department of

Defense Instruction (DoDI) 6130.03, *Medical Standards for Appointment, Enlistment, or Induction in the Military Services*, dated April 28, 2010 (Change 1), which generally prohibit the accession of transgender individuals into the Military Services, remain in effect because current or history of gender dysphoria or gender transition does not meet medical standards. In other words, there is no change to pre-existing procedures in the Air Force's accessions policy with regards to transgender individuals based on the Presidential Memorandum that was issued on August 25, 2017. As noted in the Interim Guidance this general exclusion is subject to the normal medical waiver process.

6. According to Air Force records neither the Conner Callahan nor D.L. who contacted Air Force Recruiters have applied for or been denied accession into the Air Force or a medical waiver for accession into the Air Force.

Pursuant to 28 U.S.C. § 1746, I, Phillip A. Layman, hereby declare under penalty of perjury that the foregoing is true and correct.

16 Oct 2017

Date



PHILLIP A. LAYMAN

Chief, Operations Divisions of the Air Force Recruiting Services

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2017, I electronically filed the foregoing declaration using the Court’s CM/ECF system, causing a notice of filing to be served upon all counsel of record.

Dated: October 16, 2017

/s/ Ryan Parker
RYAN B. PARKER
Senior Trial Counsel
United States Department of Justice
Civil Division, Federal Programs Branch
Telephone: (202) 514-4336
Email: ryan.parker@usdoj.gov

Counsel for Defendants