

The Honorable Marsha J. Pechman

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

RYAN KARNOSKI, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

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

**DECLARATION OF DEBORAH LEE
JAMES IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO DEFENDANTS’
MOTION FOR CLARIFICATION AND,
IF NECESSARY, A PARTIAL STAY OF
PRELIMINARY INJUNCTION PENDING
APPEAL**

NOTE ON MOTION CALENDAR:
December 29, 2017

I, Deborah Lee James, declare as follows:

1. I served as the Secretary of the United States Air Force (“USAF”) from December 20, 2013 to January 20, 2017. As Secretary, I was responsible for supervising the Department of the Air Force’s participation in a working group convened by the Department of Defense in 2015 to identify the practical issues related to transgender Americans serving openly in the Armed Forces, and to develop an implementation plan that addressed those issues with the goal of maximizing military readiness (the “Working Group”). On June 30, 2016, then Secretary of Defense Ashton Carter announced that the military would allow transgender people to openly serve. Included within that announcement and change of policy was a direction that the military would adopt changes to the accessions policy to begin allowing accession by transgender people starting on July 1, 2017.

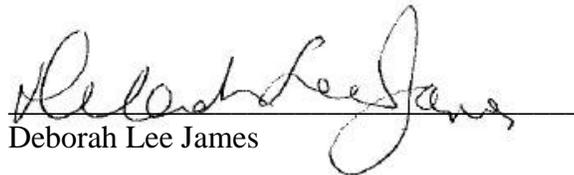
1 2. Based on my personal knowledge, the USAF had nearly completed the necessary
2 preparations for implementing the change in accessions policy when I left office in
3 January 2017.

4 3. The change in accessions to authorize transgender people to serve was consistent
5 with the approach generally for authorizing people to serve with curable or treatable medical
6 conditions. It included notifying and training medical personnel across the services regarding
7 information relating to the underlying medical condition associated with some transgender
8 individuals and the period of stability after treatment necessary for enlistment.

9 4. The preparations for implementing the change in policy could readily have been
10 completed by the initial target date of July 1, 2017, well within the current target date of
11 January 1, 2018.

12 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is
13 true and correct.

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15 Dated: December 18, 2017


Deborah Lee James

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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 all participants in the case are registered CM/ECF users and that service of the foregoing documents will be accomplished by the CM/ECF system on December 27, 2017.

s/ Chy Eaton
Chy Eaton