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**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 TERECE LEWIS
IN SUPPORT OF PLAINTIFFS’
MOTION FOR SUMMARY
JUDGMENT**

I, Terece Lewis, do hereby state as follows:

- 1. My name is Terece Lewis. I am a plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.
- 2. I am a 33-year-old woman, and I live in Bremerton, Washington with my wife and son.
- 3. I am a Petty Officer First Class in the U.S. Navy and am currently stationed at Naval Base Kitsap in Bremerton, Washington on the U.S.S. John C. Stennis.
- 4. I have served in the U.S. Navy for approximately fourteen and a half years.
- 5. I have always been dedicated to the mission of the United States Navy—to maintain, train, and equip America’s combat-ready naval forces capable of winning wars, deterring aggression, and maintaining freedom of the seas. During my over fourteen years of

1 naval service, I have defended oil platforms in the Arabian Gulf, boarded vessels and seized tons
2 of cocaine in route to the United States from South America, protected shipping lanes off the
3 coast of Africa from Somali pirates, and defended freedom of navigation in the South China Sea.
4 In 2009 and 2011, I served in Operation Enduring Freedom, which is the name for the U.S.
5 government's Global War on Terrorism between 2001 and 2014.

6 6. Over the past fourteen and a half years, I have served in a variety of roles within
7 the Navy. I have worked as a mechanic, as both an Engineman and Machinists Mate. I currently
8 serve in the latter role, which involves marine mechanics work and the maintenance and repair of
9 auxiliary systems. I have worked on the flight deck of an aircraft carrier ensuring mail and
10 critical parts get to their proper destination. I have been the public affairs officer for a major
11 shore command. I have been a career counselor advising Sailors of their career options. I have
12 stood watch as naval security forces ensure the safety and security of valuable government
13 assets.

14 7. I have received awards and decorations for my service including five Navy and
15 Marine Corps Achievement Medals, four Good Conduct Medals, a National Defense Service
16 Medal, a Global War on Terror Expeditionary Medal, Rifle Marksmanship Expert Medal, and a
17 Coast Guard Special Operations Service Ribbon.

18 8. I have continued to serve because of my commitment to my country and to my
19 family. In addition, my son was born with multiple medical complications that now require
20 constant care from physical therapists and medical staff, which has been covered by TRICARE,
21 the military's health care program. My choice to reenlist, near the close of my previous term of
22 service, ensured that my son has the proper medical care and physical therapy necessary to
23 prosper. I am currently the sole provider for my household.

24 9. I am transgender. I was assigned the sex of male at birth. However, I have known
25 for many years, since approximately early 2013, that I am female.

26 10. I began to come to terms with my gender identity approximately three years ago.
27 I thereafter started to see a mental health professional who diagnosed me with gender dysphoria.

28 11. When the ban on open service by transgender service members was lifted in June

1 2016, I decided to remain in the Navy and transition, which was the best course of action for
2 both me and my family. In late 2016, I began taking the steps necessary with my chain of
3 command to lay the groundwork for my transition.

4 12. I began living openly as a woman in late 2016.

5 13. I am taking medical steps to bring my body into conformity with my female
6 gender identity. In consultation with my physician, I began hormone therapy on July 25, 2017,
7 one day before President Trump released the transgender military ban by tweet, which has given
8 me a much more typically feminine appearance.

9 14. I have taken legal steps to transition. I legally changed my first name to Terece,
10 which is reflected on my driver's license, social security card, and all other personal records.

11 15. I have worked with my chain of command throughout my transition. I have found
12 a tremendous amount of support from both them and my enlisted peers and they have become a
13 crucial part of my personal support network during my transition.

14 16. My military medical transition plan, as designed by the Navy Medicine West
15 Transgender Care Team, specifically by Dr. Melissa Hiller Lauby, was approved on or around
16 March 1, 2017. That plan states that “[c]onsistent with currently accepted standards of care,
17 medical transition for Gender Dysphoria is clinically appropriate and medically necessary.” The
18 plan further confirms that I am “psychologically stable and fit for full duty.”

19 17. In addition to hormone therapy, my transition plan also includes transition-related
20 surgeries that cannot be performed until after March 2018. According to the plan, “[t]hese
21 surgical procedures are considered medically necessary.” However, I am not medically eligible
22 for these procedures until I have received hormone therapy for at least 12 months.

23 18. The fact that I am is transgender has not prevented me from doing my job in the
24 military. I perform a valuable service for the Navy that strengthens military readiness.
25 Conversely, my exclusion from the military on the basis of my transgender status would weaken
26 military readiness.

27 19. I was blindsided by President Trump's announcement that he would be banning
28 transgender people like me from serving in the military.

1 20. Particularly in light of the steps that the military had taken to lift the ban against
2 open service, I feel as though I was lured out with the promise that I would have a safe
3 environment in which to transition, while continuing to carry out my duties and responsibilities
4 in the Navy. Now, with no warning, I am facing a new regime that says I have no place in the
5 military, the institution for which I have sacrificed and served for the entirety of my adult life.

6 21. I am distressed and appalled by the aspersions cast by White House officials
7 about my ability to serve in the military. I lived in silence for several years and it was very
8 upsetting to have to sit on the sidelines and have people in power and in the media talk about
9 transgender people as if we are unfit to serve even though we are able and willing to put our lives
10 on the line for our country.

11 22. The White House memorandum implementing the ban solidified my fear that I
12 will be presumptively deemed ineligible to serve based solely on my transgender status. It has
13 caused me to feel like my future and my ability to provide for my family is now on quicksand.
14 The fear of being unable to provide for my child and care for his medical needs eats away at me
15 constantly. Due to my son's medical conditions, he has several appointments throughout the
16 week, nearly every day. No parent should feel as helpless as I have felt in protecting and
17 providing for my child.

18 23. Still, I continue to perform my duties with honor, doing everything that is
19 expected of me.

20 24. I feel a profound sense of rejection and betrayal. I face the loss of everything I
21 have worked so hard to achieve—the loss of my career, a critical part of my moral support
22 network, the ability to support my family, and the health insurance on which my family
23 depends—not based on my service or aptitude, but rather based on prejudice, ignorance, lies, and
24 politics.

25 25. Being able to serve openly as a transgender woman has makes me a stronger asset
26 for the military. I am able to function as a productive, healthy member of the military, without
27 the distress that would otherwise accompany untreated gender dysphoria, and I am able to forge
28 stronger relationships with others in my unit, without having to pretend to live as someone who I

1 am not. Being transgender has not negatively impacted the ability for members of my unit to
2 work together to accomplish our tasks. All of us come from different backgrounds—from how
3 we were raised, to the religion we practice, to the political beliefs we hold—but we are able to
4 put those things aside, come together as a team, and focus on the work that needs to be done, as
5 the military has trained us to do.

6 26. If permitted to do so, I would re-enlist in the military following the expiration of
7 my term of service. Indeed, I would, if I could, serve honorably in the military until the age of
8 retirement.

9 27. I have engaged in speech and conduct disclosing my transgender status and
10 expressing my gender identity, including by coming out to my chain of command and my fellow
11 service members, taking steps to transition, and living openly as a woman in civilian life. I want
12 to continue to be able to engage in speech and conduct disclosing my transgender status and
13 expressing my gender identity.

14 28. All that I want is to live openly as the woman I am and to be treated with respect
15 and dignity by the military.

16
17 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the
18 United States of America that the foregoing is true and correct.

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21 DATED: January 22, 2018



Terece Lewis

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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 January 25, 2018.



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