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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 SARAH
WARBELOW IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

I, Sarah Warbelow, declare as follows:

1. I have actual knowledge of the matters stated in this declaration.

2. I am the Legal Director for the Human Rights Campaign (“HRC”), and am authorized to submit this declaration on its behalf. HRC is a 501(c)(3) nonprofit organization incorporated in the District of Columbia. HRC is the largest civil rights organization working to achieve equality for lesbian, gay, bisexual, transgender and queer (“LGBTQ”) Americans, and represents more than 3 million members and supporters nationwide. HRC’s core mission is to ensure that LGBTQ people have and retain basic equal rights, and can be open, honest, and safe at home, at work, and in the community. HRC’s work focuses on ending discrimination against LGBTQ people, including those who wish to serve their country through the military.

3. HRC’s members include transgender individuals currently serving in the United States military and transgender individuals who wish to serve in the United States military.

1 4. HRC sues on behalf of its individual members, including Ryan Karnoski, Staff
2 Sergeant Cathrine Schmid, both of whom are also plaintiffs in the present lawsuit, and other
3 prospective and current transgender service members who are currently adversely affected by the
4 ban on open service by transgender men and women in the military.

5 5. The interest that HRC seeks to protect – the right of all Americans, including
6 transgender individuals, to serve their country in the military, and to do so openly and without
7 discrimination – relates directly to HRC’s fundamental purpose and mission as stated above.
8 HRC has a strong interest in ensuring that Mr. Karnoski, Staff Sergeant Schmid, and all of its
9 members who are prospective and current transgender service members be permitted to pursue
10 this noble career path, and that they are not excluded simply based on their status as transgender.

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

12 Executed on January 18, 2018

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15 Sarah Warbelow, Legal Director
Human Rights Campaign

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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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