

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

*Defendants.*

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

**DECLARATION OF ASHLEY  
BROADWAY IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR  
SUMMARY JUDGMENT**

I, Ashley Broadway, declare as follows:

- 1. I have actual knowledge of the matters stated in this declaration.
- 2. The American Military Partner Association (“AMPA”) is a 501(c)(3) non-profit organization based in Washington, D.C. With more than 50,000 members and supporters across the country and around the world, AMPA is the nation’s largest organization of lesbian, gay, bisexual, and transgender (“LGBT”) military families and their allies. AMPA’s mission is to connect, support, honor, and serve the partners, spouses, families, and allies of America’s LGBT service members and veterans.
- 3. I serve as the President of AMPA. I am married to a service member, and we are raising two beautiful children. My spouse, Heather, and I spent the first fourteen years of our relationship under the threat of a 1993 statute commonly referred to as “Don’t Ask, Don’t Tell” (“DADT”), which allowed for the discharge of lesbian, gay, and bisexual service members based

1 solely on their sexual orientation. Living in the shadows of that policy, and experiencing first-  
2 hand the toll that the threat of discharge can take on families, made me passionate about  
3 furthering AMPA's mission first as a founding board member, and currently, as its President.  
4 AMPA's goal is to make sure that not one more service member, spouse, or child has to live in  
5 fear of having the service member's career ended, their family life turned upside down, or their  
6 financial security stripped because of who that service member is, rather than what kind of  
7 soldier they are.

8 4. AMPA began in 2009 as a "Campaign for Military Partners" by Servicemembers  
9 United, an organization focused on repealing DADT. When DADT was repealed in 2011,  
10 Servicemembers United wound down its affairs and AMPA was formed; AMPA incorporated in  
11 2012. The partners of active duty service members founded AMPA to connect the families of  
12 LGBT service members and veterans, support them through the challenges of military-related  
13 and post-military life, and advocate on their behalf. AMPA provides assistance and education to  
14 veterans and their spouses in accessing the benefits earned through military service. It also  
15 advocates for policy changes to improve the lives of LGBT service members, veterans, and their  
16 families.

17 5. AMPA's members include transgender individuals currently serving in the United  
18 States military, including for example, U.S. Army Chief Warrant Officer Lindsey Muller, U.S.  
19 Army Staff Sergeant Cathrine Schmid, U.S. Navy Petty Officer Second Class Phillip Stephens,  
20 and U.S. Navy Petty Officer Second Class Megan Winters, who also are plaintiffs in the present  
21 lawsuit. AMPA's members also include transgender individuals who wish to access into the  
22 military, including for example Ryan Karnoski, who is also a plaintiff in the present lawsuit.  
23 AMPA sues on behalf of its individual transgender members who are directly affected by the ban  
24 on open service by transgender men and women in the military.

25 6. After President Trump tweeted on July 26, 2017 that the government would not  
26 allow transgender individuals to serve in the military "in any capacity," we were flooded with  
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1 inquiries from panicked service members and their families, whose professional and personal  
2 lives were being upended.

3 7. Many transgender service members have arranged their personal, professional,  
4 and family lives around the desire to serve their country. Some families rely solely or primarily  
5 on the transgender service member as the family breadwinner, while the other spouse devotes all  
6 of his or her energy to raising their family. Many of those families also rely on the military for  
7 health care coverage for the spouse and children, some of whom may have serious medical  
8 conditions and an urgent need for secure access to health coverage.

9 8. Raising a family while serving in the military already requires great sacrifice.  
10 Some service members must spend significant time away from their family, and some families  
11 have had to cope with frequent moves to follow the service member's career. Laying those  
12 sacrifices to waste by arbitrarily discharging transgender service members feels particularly cruel  
13 to us, because our work is a constant reminder that it is not just the service member who loses  
14 under this discriminatory ban, but their spouse and children too. The career trajectory of a  
15 service member before that discharge can never be fully restored after the fact; nor can the  
16 family stability that was lost when the service member loses the career in which the entire family  
17 has invested.

18 9. If not permanently enjoined, the ban on open service by transgender men and  
19 women will have other harmful effects such as destabilizing family finances by shunting the  
20 costs of medical care onto the family of the discharged service member. Where other families  
21 can securely rely on the service member's military employment for health coverage, the families  
22 of transgender service members will have to manage with fewer resources for their household  
23 and children. That harm is compounded by the President's directive that, absent limited  
24 exceptions, transgender service members be denied transition-related surgery after March of this  
25 year. Whereas other families could take this coverage for granted, transgender service members  
26 and their families will either have to do without medically necessary care, or make do without  
27 the family resources that now must be diverted to medical bills.



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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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