



1 I, Andrew E. Carmichael, swear under penalty of perjury under the laws of the United  
2 States to the following:

3 1. I am a Senior Trial Counsel at the United States Department of Justice and  
4 counsel of record for Defendants in this action. I submit this declaration in support of  
5 Defendants' Second Notice of Compliance Regarding ECF No 617.

6 2. Attached to this declaration as Exhibit A is a true and correct copy of the  
7 declaration of Robert Easton, Director of the Office of Litigation Counsel. Exhibit A formally  
8 asserts the deliberative process privilege on behalf of the Department of Defense over the 103  
9 documents submitted for *in camera* review.

10 3. Also attached to this declaration as Exhibit B is a privilege log that identifies the  
11 document, date, DoD number, and PrivWithhold number of the 103 documents listed in the  
12 declaration of Robert Easton submitted for *in camera* review.

13 4. Attorneys of record in this litigation have reviewed Exhibits A and B and the  
14 103 documents over which the Department of Defense formally asserts the deliberative process  
15 privilege, which are being submitted for *in camera* review.

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

18 EXECUTED this 30th day of October, 2020.

19  
20 /s/ Andrew E. Carmichael  
21 ANDREW E. CARMICHAEL  
22 Senior Trial Counsel  
23 United States Department of Justice  
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*Counsel for Defendants*

# EXHIBIT A

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

RYAN KARNOSKI, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

No. 2:17-cv-1297-MJP

**DECLARATION OF  
ROBERT E. EASTON IN  
SUPPORT OF  
DEFENDANTS'  
SUBMISSION FOR *IN*  
*CAMERA* REVIEW OF  
DOCUMENTS WITHHELD  
UNDER THE  
DELIBERATIVE PROCESS  
PRIVILEGE**

**DECLARATION OF ROBERT E. EASTON**

I, Robert E. Easton, do hereby declare as follows:

1. I currently serve as Director, Office of Litigation Counsel, in the Department of Defense (“DoD”) Office of General Counsel. I have held this position since 2006. In this capacity, I supervise the conduct and oversight of litigation of Departmental significance, including matters involving senior DoD leaders, and coordinate litigation among the Military Departments, Defense Agencies, and Field Activities.

2. In the exercise of my official duties, I have been made aware of this lawsuit and the three other cases involving the March 12, 2019 DoD Policy on Military Service by Transgender Persons and Persons with Gender Dysphoria (“DoD Transgender Service Policy”).

3. I submit this declaration in response to the Court’s July 15, 2020 and September 29, 2020 orders directing the government to provide documents to the Court for *in camera* review, and to formally assert the deliberative process privilege on behalf of DoD over the documents and information described below. I base this declaration on my personal knowledge and information made available to me in the performance of my official duties.

4. The Court directed DoD to submit for *in camera* review certain communications from January 20, 2017 to July 25, 2017, that had been listed on the DoD privilege log as withheld from production pursuant to the deliberative process privilege.

5. Based on my review of the relevant documents, I have determined that the following documents submitted with this Declaration were created as part of DoD’s decision-making processes. These documents reflect the deliberative process undertaken by DoD and military personnel in developing recommendations for Secretary of Defense James Mattis to inform his ultimate decision to delay accessions of transgender individuals into the military services, which

he made on June 30, 2017.<sup>1</sup> Accordingly, DoD invokes the deliberative process privilege over each of these documents. Where equities of the Military Services are jointly implicated in a document, DoD hereby invokes the deliberative process privilege over the deliberative material in the document. Where appropriate, DoD has redacted portions of documents submitted for *in camera* review under the attorney-client privilege, attorney work product doctrine, and/or presidential communications privilege. Where material submitted also contains content as to which DoD is not asserting the deliberative process privilege, DoD will produce redacted versions of documents where segregation is possible, such as in documents identified in Paragraphs 12 and 13.

6. There are a number of categories of documents that are subject to the deliberative process privilege. Each numbered paragraph below addresses a specific category of such documents. Bulleted subparagraphs address any subcategories of documents.

**DOCUMENTS SUBJECT TO THE DELIBERATIVE PROCESS PRIVILEGE**

7. The first category of documents consists of drafts of and communications about a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. DoD00002814, DoD00002820, DoD00004747, DoD00096902, DoD00096903, DoD00096908, DoD00096913, DoD00097036, DoD00097057, DoD00097076, DoD00094654, DoD00095869, DoD00130634, and DoD00097079 are drafts of Mr. Work's cover message to Secretary Mattis and drafts of the memorandum on accession of transgender individuals. Mr. Work's cover message to Secretary Mattis has the subject line "Recommended Transgender Way Ahead" and provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled

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<sup>1</sup> A DoD press statement dated June 30, 2017, states, "Secretary Mattis today approved a recommendation by the services to defer accessing transgender applicants into the military until Jan. 1, 2018." Dkt. 149-4.

“DELIBERATIVE” and “PRE-DECISIONAL.” The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. DoD00018197, DoD00002877, and DoD00004686 are scanned copies of Mr. Work’s cover message to Secretary Mattis and memorandum on accessions of transgender individuals that include Secretary Mattis’s handwritten notes showing Secretary Mattis’s thought processes, questions, and areas of concern. DoD00004901, DoD00004903, and DoD00084098 are email communications between senior DoD officials regarding the drafting of the memorandum that highlight specific deliberations underway among several senior DoD policy-makers to delay accessions of transgender individuals into the Military Services. These emails were sent on June 22, 2017, eight days before Secretary Mattis made his decision to delay accessions by transgender individuals. All of the documents in this category are both pre-decisional and deliberative. They are pre-decisional because they pre-date Secretary Mattis’s decision on June 30, 2017, to delay accessions of transgender applicants. They are also deliberative. They reflect the back-and-forth discussions at the highest levels of DoD regarding the transgender policy and, specifically, deliberations by senior DoD officials concerning whether there should be a delay of accessions of transgender individuals (and if so, for how long) due to concerns expressed by the Military Services. The drafts capture the policy development as it occurred, and some of the drafts reveal the thought processes and areas of concern for the Secretary of Defense as reflected in his own words.

8. The next category of documents concern edits to Mr. Work’s memorandum on military accessions of transgender individuals, described in more detail above in paragraph 7. DoD00097044, DoD00097048, DoD00097050, DoD00097052, DoD00097054, and DoD00097073 are emails between Mr. Work and Ms. Lacey Raymond, a special assistant in the Office of the Secretary of Defense, on substantive edits to Mr. Work’s memorandum. These records reveal the high-level deliberations about specific information to include in the early versions of the

memorandum and provide insight into various drafts of the document. These documents are pre-decisional. The discussions and deliberations reflected in these emails occurred on June 25 and 26, 2017, which was prior to Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. They are also deliberative. They show senior DoD officials' opinions and recommendations concerning how DoD's policy coordination process should proceed and include proposed policy options and internal discussions on Secretary Mattis's priorities.

9. Another category of similar documents consists of various drafts of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns expressed by the Military Services about that process and the accessions policy, and several proposed options and recommendations for addressing those concerns. DoD00003212, DoD00005169, DoD00005177, DoD00005181, DoD00005183, DoD00010245, DoD00018168, DoD00018224, DoD00018228, DoD00018243, and DoD00129201 are drafts of this document, some of which contain comments and proposed edits to the text of the document from senior DoD officials. These documents also provide various proposed courses of action and "pros and cons" for each course of action to assist the decision-maker in arriving at the best decision for DoD. These documents are pre-decisional because they pre-date Secretary Mattis's June 30, 2017 decision to delay accessions of transgender applicants. These documents are also deliberative. They reflect opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy.

10. The next category of documents consists of comments and proposed edits to the memorandum described above in paragraph 9. DoD00005149, DoD00006476, DoD00125545, DoD00129199, DoD00005158, DoD00005160, DoD00005163, DoD00005165, DoD00018135,

DoD00018205, DoD00018241, DoD00125540, DoD00129193, DoD00129195, and DoD00129197 are versions of the memorandum with edits and comments from various senior DoD officials, including Dr. Terry Adirim, who was then the Deputy Assistant Secretary of Defense for Health Policy and Oversight, and Ms. Stephanie Miller, Director of Military Accessions Policy.

DoD00005174 and DoD00005175 are email communications between Ms. Miller and Mr. Anthony Kurta, who was then the Official Performing the Duties of the Under Secretary of Defense for Personnel and Readiness, providing commentary and recommendations to specific aspects of the memorandum and areas they recommend addressing in more detail within the document. These documents are pre-decisional, as they pre-date Secretary Mattis's decision to delay accessions of transgender applicants on June 30, 2017, as well as finalization of the memorandum. These documents are also deliberative. They show the mental impressions, thoughts, and opinions of senior DoD officials regarding how DoD could potentially proceed on the accession of transgender applicants and options to address the concerns expressed by the Military Services regarding the accessions policy.

11. The next category of documents contains emails reflecting Secretary Mattis's views on the Military Services' positions regarding delay of military accessions by transgender individuals. Army\_10008529 and Army\_10008531 contain emails to the Secretary of the Army, Mr. Robert Speer (the most senior civilian official in the Army), and the Chief of Staff of the Army, General Mark Milley (the most senior military official in the Army), detailing a meeting where the Vice Chairman of the Joint Chiefs of Staff provided Secretary Mattis's early (and not yet final) position whether to delay military accessions of transgender individuals under the Carter policy. Army\_10008540 is a similar email from Ms. Gwendolyn DeFilippi, the Chief of Staff to the then-Acting Secretary of the Army, providing a similar account and commentary regarding the meeting. These communications are pre-decisional and deliberative. They are pre-decisional because the

emails were sent in early June 2017, before Secretary Mattis made a final decision on whether to delay accessions of transgender applicants. They are deliberative because they reflect a request for, and contain the opinions and recommendations from, the Military Services regarding the decision of whether to delay accessions of transgender applicants.

12. Another category of documents consists of emails, PowerPoint slides, and memoranda from the Military Services to the Secretary of Defense concerning whether to delay military accessions by transgender individuals. These documents are pre-decisional, as all preceded the Secretary of Defense's ultimate decision on June 30, 2017, to delay accessions of transgender applicants. These documents are also deliberative. They capture the mental impressions, thoughts, and opinions of senior DoD officials as the Department developed the details necessary to decide whether and how to delay accessions of transgender individuals. This category includes the following documents:

- DoD00004774, DoD00004797, DoD00004800, DoD00004804, DoD00096983, DoD00096994, DoD00096996, DoD00096998, DoD00097006, DoD00097012, DoD00097014, DoD00097016, DoD00097018, DoD00097020, DoD00018288, DoD00035141, DoD00036608, DoD00039698, DoD00097000, DoD00144924, Army\_10019702, CJCS\_00001065, and Navy\_00048861 contain emails from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. Army\_10010790 is an email from Mr. Paul Aswell, Chief, Accessions Policy, and Deputy Chief of Staff for Personnel, to himself detailing some of the same concerns and opinions as General Milley. Army\_10002510, Army\_10019791.0001, Army\_10019795.0001, and Army\_10019799.0001 are Army PowerPoint slides presenting the same concerns and opinions raised by General Milley. These slides are marked "PRE-DECISIONAL." Personally Identifiable

Information (PII) redactions have been taken to protect the identities of non-party service members with a diagnosis of gender dysphoria identified in these slides.

- DoD00010019 and DoD00128781 are DoD slides marked “Draft Deliberative Document” containing handwritten notes by then-Acting Under Secretary of Defense for Personnel and Readiness Anthony Kurta. Mr. Kurta’s notes reflect his mental impressions and reactions to several DoD slides depicting various possible accessions scenarios.

13. The final category of documents includes an email conversation with the Vice Chairman of the Joint Chiefs of Staff. This conversation concerns a request for a delay in accessions of transgender applicants from the Military Services, provides rationale for that delay request, and contains the mental impressions, opinions, and deliberations of senior DoD officials in reaction to that request. DoD00004938, DoD00004939, DoD00004940, DoD00004941, DoD00097250, DoD00097252, DoD00097258, DoD00097260, DoD00097262, DoD00097264, DoD00097266, DoD00097291, DoD00097293, DoD00018188, DoD00018201, and DoD00018225 contain email communications and deliberations between General Selva, Mr. Work, and others regarding the Military Service’s request to delay accessions for a period of time. The communications contain candid deliberations regarding a concern raised by one of the Military Services and the potential impact on the force. These emails are all dated in June 2017 and are pre-decisional to Secretary Mattis’s decision on June 30, 2017, to delay accessions of transgender applicants. They are also deliberative. They show the mental impressions, thoughts, and opinions of the Deputy Secretary of Defense and other senior DoD officials as they worked to respond to the concerns of the Military Services and provide accurate information to the Force.

14. As discussed in my prior declarations, release of DoD information protected by the deliberative process privilege in this case, including the materials described above, would have a substantial and immediate chilling effect on policy deliberation and development within DoD writ

large. The DoD decision-making apparatus relies on open and candid conversations among leadership, advisors, and policy analysts to advise and inform DoD policy-makers across the Military Services on various courses of action for any decision. Matters of national security frequently present multiple courses of action that require careful and delicate balancing of equities and priorities against the need to serve national defense interests, and leaders within the Department encourage open and candid discussions about the merits of such actions. Opinions identifying risks or areas of concern are critical to the integrity and viability of the military decision-making process.

15. In addition, the geographically dispersed nature of DoD activities and the high operational tempo with which many of the Department's activities are conducted mean that deliberative and pre-decisional conversations frequently occur via email. Leaders across the Department routinely solicit feedback, thoughts, and opinions on highly sensitive topics, including those with national-security implications, using email so that those who need to review and weigh-in on a decision can do so in real time regardless of their physical location.

16. The forced release of these types of delicate and candid communications would directly and immediately impair open and frank conversations at both the operational and strategic levels. If DoD personnel knew that their thoughts, impressions, and opinions, including those reflected in draft documents, whether related to DoD transgender policy or otherwise, would be open to scrutiny, they may hesitate to provide their genuine positions on potential courses of action, not only as to military personnel decisions but regarding any politically sensitive decision that DoD faces in the future, for fear that these discussions could be revealed to wider audiences. The lack of essential input would degrade DoD's decision-making process and could expose the nation to greater overall risk.

17. These risks are heightened with respect to the particular documents discussed in this declaration. These documents involve discussions at the highest levels of the military and the

Department including, for example, the Secretary of Defense and his staff, as well as the Deputy Secretary of Defense and members of the Joint Chiefs of Staff. The potential consequences for national security of chilling the decision-making process at that level are significant and should be given due weight and consideration.

18. The disclosure of deliberative, pre-decisional input, analysis, and opinions from these individuals would breach DoD's commitment to maintain the confidentiality of participants' honest deliberations regarding the sensitive and complex topic of transgender service. This would irreparably harm DoD's ability to obtain candid and open input on any similarly sensitive subject in the future, not just regarding military service by transgender individuals.

19. Finally, releasing early deliberations and early drafts of policy documents increases the likelihood of public confusion over the purpose and reasoning behind government policies. Here, releasing early deliberations concerning possible rationales for delaying accessions of transgender individuals and possible courses of action regarding the length of delay risks confusing the public as to the ultimate rationale for Secretary Mattis's decision.

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

EXECUTED this 30<sup>th</sup> day of October 2020, Arlington, VA.

A handwritten signature in black ink, appearing to read "Robert E. Easton", written over a horizontal line.

ROBERT E. EASTON  
Director, Office of Litigation Counsel

EXHIBIT B

DOCID	Priv Withhold Begin Bates	Priv Withhold End Bates	Date	Privilege(s)	Privilege Description (See DoD Declaration)
DoD00002814	PrivWithhold00013257	PrivWithhold00013305	6/28/2017	Deliberative process privilege; Attorney-client privilege	Drafts of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7. Contains redactions for attorney-client privilege.
DoD00002820	PrivWithhold00013306	PrivWithhold00013354	6/28/2017	Deliberative process privilege; Attorney-client privilege	Drafts of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7. Contains redactions for attorney-client privilege.
DoD00004747	PrivWithhold00013385	PrivWithhold00013433	6/28/2017	Deliberative process privilege; Attorney-client privilege	Drafts of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7. Contains redactions for attorney-client privilege.
DoD00096902	PrivWithhold00013680	PrivWithhold00013688	6/28/2017	Deliberative process privilege	Drafts of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00096903	PrivWithhold00013689	PrivWithhold00013689	6/28/2017	Deliberative process privilege	Draft of cover note on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00096908	PrivWithhold00013690	PrivWithhold00013699	6/28/2017	Deliberative process privilege	Draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.

DoD00096913	PrivWithhold00013700	PrivWithhold00013708	6/28/2017	Deliberative process privilege	Draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00097036	PrivWithhold00013770	PrivWithhold00013776	6/28/2017	Deliberative process privilege	Draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00097057	PrivWithhold00013787	PrivWithhold00013793	6/28/2017	Deliberative process privilege	Draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00097076	PrivWithhold00013795	PrivWithhold00013801	6/28/2017	Deliberative process privilege	Draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00094654	PrivWithhold00013622	PrivWithhold00013670	6/28/2017	Deliberative process privilege; Attorney-client privilege	Drafts of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7. Contains redactions for attorney-client privilege.
DoD00095869	PrivWithhold00013671	PrivWithhold00013679	6/28/2017	Deliberative process privilege	Draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00130634	PrivWithhold00013884	PrivWithhold00013932	6/28/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7. Contains redactions for attorney-client privilege.

DoD00097079	PrivWithhold00013802	PrivWithhold00013808	6/28/2017	Deliberative process privilege	Draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. These documents are labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00018197	PrivWithhold00013553	PrivWithhold00013565	6/28/2017	Deliberative process privilege	Scanned copy of a draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. This scanned copy contains Secretary Mattis's handwritten notes showing Secretary Mattis's thought processes, questions, and areas of concern. Labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00002877	PrivWithhold00013355	PrivWithhold00013367	6/28/2017	Deliberative process privilege	Scanned copy of a draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. This scanned copy contains Secretary Mattis's handwritten notes showing Secretary Mattis's thought processes, questions, and areas of concern. Labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00004686	PrivWithhold00013372	PrivWithhold00013384	6/28/2017	Deliberative process privilege	Scanned copy of a draft of a memorandum on military service by transgender individuals written by Mr. Robert Work, the Deputy Secretary of Defense, for Secretary of Defense Mattis. Provides a recommendation to Secretary Mattis on the way forward concerning accessions by transgender individuals. This scanned copy contains Secretary Mattis's handwritten notes showing Secretary Mattis's thought processes, questions, and areas of concern. Labeled "DELIBERATIVE" and "PRE-DECISIONAL." The memorandum is dated June 28, 2017, which is two days before Secretary Mattis made his decision to delay accessions by transgender individuals. See Declaration of Robert Easton ¶ 7.
DoD00004901	PrivWithhold00013457	PrivWithhold00013457	6/22/2017	Deliberative process privilege	Email communications between senior DoD officials regarding the drafting of the memorandum and highlight specific deliberations underway among several senior DoD policy-makers to delay accessions of transgender individuals into the Military Services. These emails are predecisional because they were sent on June 22, 2017, eight days before Secretary Mattis made his decision to delay accessions by transgender individuals. They are also deliberative. They reflect the back-and-forth discussions at the highest levels of the DoD regarding the transgender policy and, specifically, deliberations by senior DoD officials concerning whether there should be a delay of accessions of transgender individuals (and, if so, for how long) due to the expressed concerns of the Military Services. See Declaration of Robert Easton ¶ 7.

DoD00004903	PrivWithhold00013458	PrivWithhold00013458	6/22/2017	Deliberative process privilege	Email communications between senior DoD officials regarding the drafting of the memorandum and highlight specific deliberations underway among several senior DoD policy-makers to delay accessions of transgender individuals into the Military Services. These emails are predecisional because they were sent on June 22, 2017, eight days before Secretary Mattis made his decision to delay accessions by transgender individuals. They are also deliberative. They reflect the back-and-forth discussions at the highest levels of the DoD regarding the transgender policy and, specifically, deliberations by senior DoD officials concerning whether there should be a delay of accessions of transgender individuals (and, if so, for how long) due to the expressed concerns of the Military Services. See Declaration of Robert Easton ¶ 7.
DoD00084098	PrivWithhold00013621	PrivWithhold00013621	6/22/2017	Deliberative process privilege	Email communications between senior DoD officials regarding the drafting of the memorandum and highlight specific deliberations underway among several senior DoD policy-makers to delay accessions of transgender individuals into the Military Services. These emails are predecisional because they were sent on June 22, 2017, eight days before Secretary Mattis made his decision to delay accessions by transgender individuals. They are also deliberative. They reflect the back-and-forth discussions at the highest levels of the DoD regarding the transgender policy and, specifically, deliberations by senior DoD officials concerning whether there should be a delay of accessions of transgender individuals (and, if so, for how long) due to the expressed concerns of the Military Services. See Declaration of Robert Easton ¶ 7.
DoD00097044	PrivWithhold00013777	PrivWithhold00013778	6/25/2017, 6/26/2017	Deliberative process privilege	Emails between Mr. Robert Work, the Deputy Secretary of Defense, and Ms. Lacey Raymond, a special assistant within the Office of the Secretary of Defense, on substantive edits to his memorandum on accessions of transgender individuals. These records reveal the high-level deliberations about specific information to include in the early versions of the memorandum and provide insight into various drafts of the document. These documents are pre-decisional. The discussions and deliberations reflected in these emails occurred on June 25 and 26, 2017, which was prior Secretary Mattis's decision to delay accessions of transgender applicants on June 30, 2017. They are also deliberative. They show senior DoD officials' opinions and recommendations concerning how DoD's policy coordination process should proceed and include proposed policy options and internal discussions on Secretary Mattis's priorities. See Declaration of Robert Easton ¶ 8.
DoD00097048	PrivWithhold00013779	PrivWithhold00013780	6/25/2017, 6/26/2017	Deliberative process privilege	Emails between Mr. Robert Work, the Deputy Secretary of Defense, and Ms. Lacey Raymond, a special assistant within the Office of the Secretary of Defense, on substantive edits to his memorandum on accessions of transgender individuals. These records reveal the high-level deliberations about specific information to include in the early versions of the memorandum and provide insight into various drafts of the document. These documents are pre-decisional. The discussions and deliberations reflected in these emails occurred on June 25 and 26, 2017, which was prior Secretary Mattis's decision to delay accessions of transgender applicants on June 30, 2017. They are also deliberative. They show senior DoD officials' opinions and recommendations concerning how DoD's policy coordination process should proceed and include proposed policy options and internal discussions on Secretary Mattis's priorities. See Declaration of Robert Easton ¶ 8.

DoD00097050	PrivWithhold00013781	PrivWithhold00013782	6/25/2017, 6/26/2017	Deliberative process privilege	Emails between Mr. Robert Work, the Deputy Secretary of Defense, and Ms. Lacey Raymond, a special assistant within the Office of the Secretary of Defense, on substantive edits to his memorandum on accessions of transgender individuals. These records reveal the high-level deliberations about specific information to include in the early versions of the memorandum and provide insight into various drafts of the document. These documents are pre-decisional. The discussions and deliberations reflected in these emails occurred on June 25 and 26, 2017, which was prior Secretary Mattis's decision to delay accessions of transgender applicants on June 30, 2017. They are also deliberative. They show senior DoD officials' opinions and recommendations concerning how DoD's policy coordination process should proceed and include proposed policy options and internal discussions on Secretary Mattis's priorities. See Declaration of Robert Easton ¶ 8.
DoD00097052	PrivWithhold00013783	PrivWithhold00013784	6/25/2017, 6/26/2017	Deliberative process privilege	Emails between Mr. Robert Work, the Deputy Secretary of Defense, and Ms. Lacey Raymond, a special assistant within the Office of the Secretary of Defense, on substantive edits to his memorandum on accessions of transgender individuals. These records reveal the high-level deliberations about specific information to include in the early versions of the memorandum and provide insight into various drafts of the document. These documents are pre-decisional. The discussions and deliberations reflected in these emails occurred on June 25 and 26, 2017, which was prior Secretary Mattis's decision to delay accessions of transgender applicants on June 30, 2017. They are also deliberative. They show senior DoD officials' opinions and recommendations concerning how DoD's policy coordination process should proceed and include proposed policy options and internal discussions on Secretary Mattis's priorities. See Declaration of Robert Easton ¶ 8.
DoD00097054	PrivWithhold00013785	PrivWithhold00013786	6/25/2017, 6/26/2017	Deliberative process privilege	Emails between Mr. Robert Work, the Deputy Secretary of Defense, and Ms. Lacey Raymond, a special assistant within the Office of the Secretary of Defense, on substantive edits to his memorandum on accessions of transgender individuals. These records reveal the high-level deliberations about specific information to include in the early versions of the memorandum and provide insight into various drafts of the document. These documents are pre-decisional. The discussions and deliberations reflected in these emails occurred on June 25 and 26, 2017, which was prior Secretary Mattis's decision to delay accessions of transgender applicants on June 30, 2017. They are also deliberative. They show senior DoD officials' opinions and recommendations concerning how DoD's policy coordination process should proceed and include proposed policy options and internal discussions on Secretary Mattis's priorities. See Declaration of Robert Easton ¶ 8.
DoD00097073	PrivWithhold00013794	PrivWithhold00013794	6/25/2017, 6/26/2017	Deliberative process privilege	Emails between Mr. Robert Work, the Deputy Secretary of Defense, and Ms. Lacey Raymond, a special assistant within the Office of the Secretary of Defense, on substantive edits to his memorandum on accessions of transgender individuals. These records reveal the high-level deliberations about specific information to include in the early versions of the memorandum and provide insight into various drafts of the document. These documents are pre-decisional. The discussions and deliberations reflected in these emails occurred on June 25 and 26, 2017, which was prior Secretary Mattis's decision to delay accessions of transgender applicants on June 30, 2017. They are also deliberative. They show senior DoD officials' opinions and recommendations concerning how DoD's policy coordination process should proceed and include proposed policy options and internal discussions on Secretary Mattis's priorities. See Declaration of Robert Easton ¶ 8.

DoD00003212	PrivWithhold00013368	PrivWithhold00013371	3/12/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains comments and proposed edits to the text of the document from senior DoD officials. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.
DoD00005169	PrivWithhold00013500	PrivWithhold00013503	3/18/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.
DoD00005177	PrivWithhold00013508	PrivWithhold00013511	3/12/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains comments and proposed edits to the text of the document from senior DoD officials. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.

DoD00005181	PrivWithhold00013512	PrivWithhold00013515	3/12/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains comments and proposed edits to the text of the document from senior DoD officials. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.
DoD00005183	PrivWithhold00013516	PrivWithhold00013519	3/12/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains comments and proposed edits to the text of the document from senior DoD officials. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.
DoD00010245	PrivWithhold00013537	PrivWithhold00013540	3/18/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.

DoD00018168	PrivWithhold00013546	PrivWithhold00013549	3/12/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains comments and proposed edits to the text of the document from senior DoD officials. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.
DoD00018224	PrivWithhold00013576	PrivWithhold00013579	3/18/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.
DoD00018228	PrivWithhold00013583	PrivWithhold00013586	3/12/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains comments and proposed edits to the text of the document from senior DoD officials. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.

DoD00018243	PrivWithhold00013592	PrivWithhold00013595	3/12/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains comments and proposed edits to the text of the document from senior DoD officials. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.
DoD00129201	PrivWithhold00013880	PrivWithhold00013883	3/18/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 9. Contains redactions of information subject to the attorney-client privilege.
DoD00005149	PrivWithhold00013471	PrivWithhold00013477	3/27/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains visible edits in track changes. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00006476	PrivWithhold00013520	PrivWithhold00013523	3/20/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains visible edits in track changes. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.

DoD00125545	PrivWithhold00013842	PrivWithhold00013845	3/18/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains visible edits in track changes. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00129199	PrivWithhold00013876	PrivWithhold00013879	3/18/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains visible edits in track changes. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00005158	PrivWithhold00013478	PrivWithhold00013482	3/22/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00005160	PrivWithhold00013483	PrivWithhold00013487	3/21/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.

DoD00005163	PrivWithhold00013488	PrivWithhold00013492	3/21/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00005165	PrivWithhold00013493	PrivWithhold00013499	3/20/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains visible edits in track changes and comments concerning the content of the memorandum. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00018135	PrivWithhold00013541	PrivWithhold00013545	3/21/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00018205	PrivWithhold00013569	PrivWithhold00013575	3/27/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains visible edits in track changes. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.

DoD00018241	PrivWithhold00013587	PrivWithhold00013591	3/22/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00125540	PrivWithhold00013835	PrivWithhold00013841	3/20/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains visible edits in track changes and comments concerning the content of the memorandum. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00129193	PrivWithhold00013859	PrivWithhold00013863	3/21/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00129195	PrivWithhold00013864	PrivWithhold00013868	3/21/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.

DoD00129197	PrivWithhold00013869	PrivWithhold00013875	3/20/2017	Deliberative process privilege; Attorney-client privilege	Draft of a memorandum written by senior DoD officials for Secretary Mattis describing the policy development process undertaken in formulating DoD's prior policy on accessions and military service of transgender individuals, concerns with that process and the accessions policy expressed by the Military Services, and several proposed options (including "pros and cons" for each course of action) and recommendations for addressing those concerns. Contains visible edits in track changes and comments concerning the content of the memorandum. This document is pre-decisional because it pre-dates Secretary Mattis's decision to delay accessions of transgender applicants, which was made on June 30, 2017. This document is deliberative because it is a draft and it reflects opinions and recommendations from officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10. Contains redactions of information subject to the attorney-client privilege.
DoD00005174	PrivWithhold00013504	PrivWithhold00013505	3/12/2017, 3/13/2017	Deliberative Process Privilege	Email communications between Ms. Stephanie Miller, Director of Military Accessions Policy, and Mr. Anthony Kurta, who was then Performing the Duties of the Under Secretary of Defense for Personnel and Readiness, providing commentary and recommendations to specific aspects of the memorandum and areas they recommend addressing in more detail within the document. These emails are pre-decisional because they pre-date Secretary Mattis's decision to delay accessions of transgender applicants on June 30, 2017, as well as the finalization of the memorandum provided to Secretary Mattis to assist him in making his decision. These emails are deliberative because they show the mental impressions, thoughts, and opinions of senior DoD officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10.
DoD00005175	PrivWithhold00013506	PrivWithhold00013507	3/12/2017	Deliberative Process Privilege	Email communications between Ms. Stephanie Miller, Director of Military Accessions Policy, and Mr. Anthony Kurta, who was then Performing the Duties of the Under Secretary of Defense for Personnel and Readiness, providing commentary and recommendations to specific aspects of the memorandum and areas they recommend addressing in more detail within the document. These emails are pre-decisional because they pre-date Secretary Mattis's decision to delay accessions of transgender applicants on June 30, 2017, as well as the finalization of the memorandum provided to Secretary Mattis to assist him in making his decision. These emails are deliberative because they show the mental impressions, thoughts, and opinions of senior DoD officials regarding how DoD could potentially proceed on the accession of transgender applicants and possible options to address the concerns expressed by the Military Services regarding the accessions policy. See Declaration of Robert Easton ¶ 10.
Army_10008529	PrivWithhold00013185	PrivWithhold00013186	6/6/2017	Deliberative Process Privilege	Email to the Secretary of the Army, Mr. Robert Speer (the most senior civilian official in the Army), and the Chief of Staff of the Army, General Mark Milley (the most senior military official in the Army), detailing a meeting where the Vice Chairman of the Joint Chiefs of Staff provided Secretary Mattis's early (and not yet final) position whether to delay military accessions of transgender individuals under the Carter policy. The email is pre-decisional because when it was sent in early June 2017, Secretary Mattis had not rendered a final decision on whether to delay accessions of transgender applicants. The email is deliberative because it shows a request for input and contains the opinions and recommendations from the Military Services to Secretary Mattis into the decision on whether to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 11.

Army_10008531	PrivWithhold00013187	PrivWithhold00013188	6/6/2017	Deliberative Process Privilege	Email to the Secretary of the Army, Mr. Robert Speer (the most senior civilian official in the Army), and the Chief of Staff of the Army, General Mark Milley (the most senior military official in the Army), detailing a meeting where the Vice Chairman of the Joint Chiefs of Staff provided Secretary Mattis's early (and not yet final) position whether to delay military accessions of transgender individuals under the Carter policy. The email is pre-decisional because when it was sent in early June 2017, Secretary Mattis had not rendered a final decision on whether to delay accessions of transgender applicants. The email is deliberative because it shows a request for input and contains the opinions and recommendations from the Military Services to Secretary Mattis into the decision on whether to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 11.
Army_10008540	PrivWithhold00013189	PrivWithhold00013190	6/8/2017	Deliberative Process Privilege	Email from Ms. Gwendolyn DeFilippi, the Chief of Staff to the then Acting Secretary of the Army, detailing a meeting where the Vice Chairman of the Joint Chiefs of Staff provided Secretary Mattis's early (and not yet final) position whether to delay military accessions of transgender individuals under the Carter policy. The email is pre-decisional because when it was sent in early June 2017, Secretary Mattis had not rendered a final decision on whether to delay accessions of transgender applicants. The email is deliberative because it shows a request for input and contains the opinions and recommendations from the Military Services to Secretary Mattis into the decision on whether to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 11.
DoD00004774	PrivWithhold00013434	PrivWithhold00013438	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00004797	PrivWithhold00013439	PrivWithhold00013445	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00004800	PrivWithhold00013446	PrivWithhold00013451	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.

DoD00004804	PrivWithhold00013452	PrivWithhold00013456	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00096983	PrivWithhold00013709	PrivWithhold00013713	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00096994	PrivWithhold00013714	PrivWithhold00013718	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00096996	PrivWithhold00013719	PrivWithhold00013723	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00096998	PrivWithhold00013724	PrivWithhold00013729	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.

DoD00097006	PrivWithhold00013736	PrivWithhold00013742	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00097012	PrivWithhold00013743	PrivWithhold00013748	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00097014	PrivWithhold00013749	PrivWithhold00013754	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00097016	PrivWithhold00013755	PrivWithhold00013759	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00097018	PrivWithhold00013760	PrivWithhold00013764	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.

DoD00097020	PrivWithhold00013765	PrivWithhold00013769	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00018288	PrivWithhold00013596	PrivWithhold00013602	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00035141	PrivWithhold00013603	PrivWithhold00013608	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00036608	PrivWithhold00013609	PrivWithhold00013614	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00039698	PrivWithhold00013615	PrivWithhold00013620	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.

DoD00097000	PrivWithhold00013730	PrivWithhold00013735	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
DoD00144924	PrivWithhold00013933	PrivWithhold00013936	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
Army_10019702	PrivWithhold00013192	PrivWithhold00013197	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
CJCS_00001065	PrivWithhold00013252	PrivWithhold00013256	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
Navy_00048861	PrivWithhold00013937	PrivWithhold00013940	6/26/2017	Deliberative Process Privilege	Email from General Mark Milley, the Chief of Staff of the Army, detailing the Army's opinion and recommendations regarding whether to delay the accession of transgender individuals into military service. These communications set out various Army concerns and the rationale for these concerns. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.

Army_10010790	PrivWithhold00013191	PrivWithhold00013191	6/24/2017	Deliberative Process Privilege	Email from Mr. Paul Aswell, Chief, Army Accessions Policy and Deputy Chief of Staff for Personnel, to himself detailing various Army concerns with accessing transgender individuals. The email is pre-decisional because it preceded the Secretary of Defense's ultimate decision to delay accessions of transgender applicants on June 30, 2017. The email is deliberative because it captures the mental impressions, thoughts, and opinions of a senior Army official as DoD developed the necessary details to decide whether and how to delay accessions of transgender individuals. See Declaration of Robert Easton ¶ 12.
Army_10002510	PrivWithhold00013167	PrivWithhold00013184	6/25/2017	Deliberative process privilege	PowerPoint slides describing the Army's questions and concerns relating to whether to delay the accession of transgender individuals into military service. Slides are marked "PRE-DECISIONAL" and pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 12. Contains redactions of personally identifiable information to protect the identities of non-party service members diagnosed with gender dysphoria.
Army_10019791	PrivWithhold00013198	PrivWithhold00013215	6/25/2017	Deliberative process privilege	PowerPoint slides describing the Army's questions and concerns relating to whether to delay the accession of transgender individuals into military service. Slides are marked "PRE-DECISIONAL" and pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 12. Contains redactions of personally identifiable information to protect the identities of non-party service members diagnosed with gender dysphoria.
Army_10019795	PrivWithhold00013216	PrivWithhold00013233	6/25/2017	Deliberative process privilege	PowerPoint slides describing the Army's questions and concerns relating to whether to delay the accession of transgender individuals into military service. Slides are marked "PRE-DECISIONAL" and pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 12. Contains redactions of personally identifiable information to protect the identities of non-party service members diagnosed with gender dysphoria.
Army_10019799	PrivWithhold00013234	PrivWithhold00013251	6/25/2017	Deliberative process privilege	PowerPoint slides describing the Army's questions and concerns relating to whether to delay the accession of transgender individuals into military service. Slides are marked "PRE-DECISIONAL" and pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 12. Contains redactions of personally identifiable information to protect the identities of non-party service members diagnosed with gender dysphoria.
DoD00010019	PrivWithhold00013524	PrivWithhold00013536	7/7/2017	Deliberative process privilege	DoD slides describing various potential accessions scenarios and issues and containing Anthony Kurta's handwritten notes, reflecting his mental impressions and reactions to such scenarios and issues. See Declaration of Robert Easton ¶ 12.
DoD00128781	PrivWithhold00013846	PrivWithhold00013858	7/7/2017	Deliberative process privilege	DoD slides describing various potential accessions scenarios and issues and containing Anthony Kurta's handwritten notes, reflecting his mental impressions and reactions to such scenarios and issues. See Declaration of Robert Easton ¶ 12.
DoD00004938	PrivWithhold00013459	PrivWithhold00013461	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00004939	PrivWithhold00013462	PrivWithhold00013464	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.

DoD00004940	PrivWithhold00013465	PrivWithhold00013467	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00004941	PrivWithhold00013468	PrivWithhold00013470	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00097250	PrivWithhold00013809	PrivWithhold00013811	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00097252	PrivWithhold00013812	PrivWithhold00013814	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00097258	PrivWithhold00013815	PrivWithhold00013817	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00097260	PrivWithhold00013818	PrivWithhold00013820	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00097262	PrivWithhold00013821	PrivWithhold00013823	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00097264	PrivWithhold00013824	PrivWithhold00013825	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.

DoD00097266	PrivWithhold00013826	PrivWithhold00013828	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00097291	PrivWithhold00013829	PrivWithhold00013831	6/17/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00097293	PrivWithhold00013832	PrivWithhold00013834	6/17/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00018188	PrivWithhold00013550	PrivWithhold00013552	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00018201	PrivWithhold00013566	PrivWithhold00013568	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.
DoD00018225	PrivWithhold00013580	PrivWithhold00013582	6/20/2017	Deliberative process privilege; Attorney-client privilege	Email conversation involving the Vice Chairman of the Joint Chiefs of Staff containing mental impressions, opinions, and deliberations of senior DoD officials in reaction to the Military Services' request to delay accessions of transgender applicants. Emails pre-date Secretary Mattis's decision on June 30, 2017, to delay accessions of transgender applicants. See Declaration of Robert Easton ¶ 13. Contains redactions of information subject to the attorney-client privilege.