

# Exhibit E

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

ZANDER SCHLACTER, *et al.*,

*Plaintiffs,*

v.

U.S. DEPT. OF STATE, *et al.*,

*Defendants.*

Case No. 1:25-CV-01344-GLR

**DECLARATION OF ZANDER SCHLACTER IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Zander Schlacter, being of legal age and sound mind, do hereby declare and state as follows:

1. I am a Plaintiff in the above-captioned case. I have actual knowledge of the matters stated in this declaration and would testify competently to these facts if called to do so.
2. I am 29 years old. I am a United States citizen and currently live in Brooklyn, New York.
3. I am employed as a textile artist and designer, owning and operating a small business where I work on commission for various clients and create and sell my own work to the public.
4. I am a man.
5. I am also transgender. I was assigned female at birth, but I have a male gender identity.

6. Below is a picture of me:



7. I was diagnosed with gender dysphoria in 2018 when I was 23 years old.

8. Since 2018, I have taken steps to bring all aspects of my life into conformity with my male gender identity, including steps to socially and medically transition.

9. I had been using the name Zander both professionally and personally since 2023 and in 2024, I completed a legal name and gender change in New York State. After my legal name and gender change, I applied to update my New York state driver's license with my new legal name and sex designation. Around this time, I also updated my legal name with the Social Security Administration and updated the sex designation to "M" on my U.S. passport. I was born in a state that currently forbids trans people from updating the sex designation on their birth certificates, but

I do plan to update my legal name on my birth certificate as well.

10. Though I live my life as a man, and many people who meet me for the first time assume I am cisgender, I experience significant discomfort navigating situations with mismatched identification documents. This discomfort is so intense that it causes me to avoid situations where I might need to use an incorrect document or show both accurate and inaccurate IDs, for fear of being outed without my permission and facing subsequent harassment and discrimination.

11. I also experience tremendous anxiety when using public restrooms, especially when visiting my family in my home state in the southeastern United States, which is incredibly hostile to transgender people, or when traveling internationally in countries that are politically conservative and inhospitable to transgender people. I have been glared at, openly discussed by strangers, and generally made to feel unwelcome and unsafe in many public places. Incorrect and mismatched identification documents have exacerbated my anxiety and caused me to generally avoid bathroom usage in public altogether.

12. These realities and experiences are why I sent an expedited application to update my legal name on my passport, using form DS-5504, which the State Department received January 14, 2025.

13. I travel often for work both domestically and internationally, and I knew that there would be opportunities for international work travel this year. I wanted to ensure that my identity documents would all reflect the correct name, Zander, and the correct sex designation of male, so that I would hopefully be less likely to encounter harassment or discrimination while traveling.

14. Given all of this, it was alarming, frustrating, and frankly terrifying when in February 2025, I received back a passport that had my name updated to Zander but my sex designation reverted from an "M" to an "F." This new passport, which expires in 2035, incorrectly identifies my sex as female, despite my being a man and despite the gender marker on almost all

my other government identification documents correctly identifying me as male.

15. I also received a letter from the State Department which stated, “the date of birth, place of birth, name, or sex was corrected on your passport application,” with “sex” circled in red. The stated reason was “to correct your information to show your biological sex at birth.” I did not ask for, or need this information to be reviewed or “corrected,” as my sex designation already correctly reflected an “M.”

16. And now because of the New Passport Policy, it is impossible for me to correct the sex designation on this passport. As a result, my passport and state identification documents are incongruent with each other, which creates precisely the situation that I have been working to avoid, one in which private information is shared with border officials of any country I might be passing through or visiting, which may not be accepting of transgender people like me.

17. I reasonably fear that possessing a passport that fails to match my gender identity increases the chance that I will be subjected to invasions of privacy, prejudice, discrimination, distress, harassment, or violence while traveling.

18. I am also concerned that the incorrect sex designation on my passport could be used as a basis to question, or at worst, fail to recognize my marriage, as the sex designation on my spouse’s passport is “F.” This fear is particularly relevant for countries we may be visiting that do not recognize same-sex marriage, which is most countries in the world.

19. I am harmed by the New Passport Policy emotionally, mentally, and economically. I need my identity documents to be congruent with the man that I am, and I believe that my gender identity should be recognized and respected by the United States government.

20. Knowing I would have to present my inaccurate passport will dissuade me from traveling to promote my artwork and business, and from submitting my work for consideration by companies and individuals abroad.

21. Being denied a passport that accurately reflects my sex, as determined by my gender identity, is psychologically and emotionally harmful to me. My passport is a persistent reminder that the government does not respect me for who I am, and I remain in fear of what may happen the next time I have to show my passport to a stranger.

\* \* \*

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

Executed on May 5, 2025

\_\_\_\_\_  
/s/\*

Zander Schlacter

\*Counsel hereby certifies that he has a signed copy of the foregoing document available for inspection at any time by the court or a party to this action.