

EXHIBIT F

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 LIA HEPLER-MACKEY IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Lia Hepler-Mackey, 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 24 years old. I am a United States citizen and currently live in California.
3. I am employed as an online tutor and teacher working with youth to teach them coding and other computer science and software-based skills.
4. I am a woman.
5. I am also transgender. I was assigned male at birth, but I have a female gender identity.

6. Below is a picture of me:



7. I was diagnosed with gender dysphoria in 2022 when I was 22 years old.

8. Since 2022, I have taken steps to bring all aspects of my life into conformity with my female gender identity, including steps to socially and medically transition.

9. In June 2024, I completed a legal name and gender change and then updated my name and sex designation records with the Social Security Administration. Afterwards, I updated my California state driver's license with my new legal name and sex designation. I have also updated my California birth certificate to reflect my legal name and female sex marker.

10. I enjoy living in my new city after graduating from college because everyone I interact with knows me and treats me as a woman. My students don't have any trouble calling me Ms. Hepler-Mackey, or using correct pronouns for me, it is essentially a non-issue. I've made friends here and am involved in the dance community, having done and enjoyed swing dancing

and other kinds of dance. I have a very close and good relationship with my parents who are supportive of me and view and treat me as their daughter. I'm proud and happy of the life that I am building for myself.

11. While I am proud of the life that I am building, I do feel worried about the future, and that worry became more significant after the recent presidential election of Donald Trump. I watched Donald Trump demean and disparage transgender people throughout his campaign to score political points. After his election to office, I became serious about protecting myself in every way that I could. Someday I would like to travel outside of the United States to visit countries that are more supportive and welcoming to transgender people like me.

12. A practical step I knew I would need to take is to make sure that all my legal documents were aligned with my gender identity; to hopefully minimize discrimination or harassment I might face in the future. The last document I needed to secure that would reflect my correct name and sex designation was a U.S. passport. I hoped to apply for my first passport sooner, but I did not have a copy of my original birth certificate and so had to request a new copy from California, and unfortunately, it took a very long time to arrive. I am also on a tight budget, and it took some time for me to save up the extra money for the passport application fee.

13. On January 21, I submitted a DS-11 form for my first passport. The friend who was with me while I was submitting my application asked if it would give me peace of mind to have the application expedited and when I said yes, she covered the cost for me on the spot. At the time I submitted the application, I did not yet have my updated California birth certificate, so instead I included my old birth certificate, which incorrectly lists my sex designation as "M," along with a copy of my legal name and gender change court order.

14. I tracked the mailing to the passport office and checked the website each day to see if there had been any progress on processing my application.

15. It was during this time that I watched everything unfold with the Executive Order and the State Department telling all officials to put requests for correct sex designations on hold. I was very worried this would include my application, even though I had never had a passport before and submitted my legal name and gender change order from a California court.

16. As I feared, at the end of February, I received a passport with my legal name updated but with an incorrect sex designation of “M” or “male.” This passport expires February 2035. 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 match our records.”

17. This inaccurate passport makes it impossible for me to travel outside of the United States because I have already faced invasive and harassing searches by TSA officials. I am incredibly afraid of this happening again, which was why I was trying to make sure all my IDs were updated before I made any travel plans.

18. Knowing I would have to present a passport with information that outs me as transgender to any stranger looking at it means that I will not be about to travel outside of the United States. I know that this incorrect document now increases the chances, which were already high, that I will be subjected to invasions of privacy, prejudice, discrimination, distress, harassment, or violence.

19. 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

A handwritten signature in black ink that reads "Lia Hepler-Mackey". The signature is written in a cursive style and is positioned above a horizontal line.

Lia Hepler-Mackey