

EXHIBIT G

**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 JILL TRAN IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

I, Jill Tran, 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 27 years old. I am a United States citizen and currently live in Maryland.
3. I currently work part time at a hair salon.
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 24 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 January 2023 I completed a legal name change in Maryland and then updated my Maryland state driver's license with my new legal name and sex designation. Around this time, I also updated my legal name and sex with the Social Security Administration. I am in the process of updating my Maryland birth certificate to reflect my legal name and female sex marker.

10. Since graduating college and transitioning, I feel more comfortable moving through the world and being recognized as the woman I am, though I am still careful about who I share my transgender status with in my day to day life.

11. I have a partner and have made friends that I play board games and card games with on the weekend, and they all know and accept me as a woman. I have a good relationship with my parents who also support me.

12. Though I've updated most of my identity documents, I realized that I had not yet gotten my passport renewed to reflect my legal name and correct sex marker. After the inauguration, I saw news about the State Department suspending some people's applications and I got worried about my ability to get my correct name and sex on my passport. I want to be able to travel outside of the United States with my partner or friends without any issues, so I put together my application to renew my old passport with an update to my name and sex designation.

13. In early February, I sent in my application to renew my old passport, using the DS-84 form, and I also paid an extra \$60 to have my application expedited. I also submitted a copy of my legal name and gender change from Maryland.

14. At end of February, I received a passport with my legal name updated but still 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."

15. I still have not received back the copy of my legal name and gender change order from the State Department.

16. This new inaccurate passport now makes it basically impossible for me to travel outside of the United States. This is because I remember the fear and anxiety I felt about driving my car before I had a driver's license with a correct sex designation. I was incredibly afraid of just the possibility of having to show my license if I were to get in a car accident, or be pulled over by law enforcement, and be required to show them a license that did not reflect my female presentation

and identity.

17. With travel outside of the U.S., it is not just possible that I will have to show my passport to someone, it is required. It is even more terrifying to think about how a TSA official or

Customs and Border official might react and that would I be very powerless in that situation.

18. I also cannot use this passport for other important things like filling out I-9 employment paperwork at a new job which I may have to do soon. It is paralyzing to think of trying to present this passport when filling out paperwork at a new job.


19. I know that having this passport with an incorrect sex designation now increases the chances, which were already high, that I will be subjected to invasions of privacy, prejudice, discrimination, and harassment.

20. 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

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Jill Tran