

Exhibit I

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 PETER POE IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

I, Peter Poe, 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 22 years old. I am a United States citizen and currently live in Prince George's County, Maryland.
3. I am a student at a university where I am studying environmental science and entomology, the study of insects. I hope to work in environmental sciences after graduation.
4. I am a man.
5. I am also transgender. I was assigned female at birth, but I have a male gender identity.

6. Attached to this declaration as Exhibit A is a picture of me.
7. I was diagnosed with gender dysphoria in 2021 when I was 19 years old.
8. Since 2020, 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 live my life as a man. A few close friends know that I am transgender, but most people who meet me assume I am a cisgender man. I'm glad this is how people interact with me, I just want them to know me as a guy, since that's what I am.
10. I knew I was a man long before being diagnosed with gender dysphoria, but my family was not initially supportive of me and so I had to wait until after I graduated from high school to live authentically. It has taken some time but now my family, especially my dad, are my biggest supporters.
11. I have been feeling pretty great about my life the last couple of years. I am enjoying my classes and field of study, I have two cats that keep me on my toes, and a very supportive roommate who is also transgender. I have also been dating a woman for a few months who I really care about and who cares about me, too. My life has felt like it is getting better every day.
12. Because most everyone I encounter in my day-to-day life over the last few years has correctly identified me as a man, I have not rushed to update my identity documents. But then in November 2024, when I went to vote in the presidential election, the poll workers who reviewed my driver's license to confirm my eligibility to vote questioned my identity because the name and picture on my driver's license shows my old name, an "F" sex designation, and a photo that does not look like me at all. A poll worker repeatedly told me I was in the wrong place, and refused to look at my voter registration card that confirmed that I was at the correct location. I had to wait a long time for the poll workers to confirm my identity and they were not educated about how to respectfully treat transgender people. After finally clearing me to vote, a poll worker returned my

ID and referred to me a “he/she,” which I found disrespectful. While I was eventually able to cast my vote, this experience was incredibly embarrassing and humiliating. After leaving the polling station, I thought about how if someone had been even slightly more hostile, I might not have been able to vote at all, just because I am transgender.

13. This experience scared me and also motivated me to update my identity documents as quickly as possible. I started with a legal name and gender change in Maryland, the state that I was born in and have lived my entire life. After that, I updated my legal name and sex designation on my Maryland driver’s license and my records with the Social Security Administration. And finally, I am awaiting the arrival of my updated Maryland birth certificate, which should be arriving in the mail any day now.

14. That feeling of great things happening in my life came to an abrupt stop in January this year. Just as I was getting ready to submit my paperwork to update my name and sex designation on my U.S. passport, the State Department announced it would be suspending all applications seeking sex marker changes. I was terrified. I started to hear stories about trans people’s documents being confiscated without a timeline of when they would be returned. Instead of sending my application in and getting an incorrect sex designation on my passport, I decided to wait and see what happened, in case there was an exception made for people like me who had all of their documents, including their birth certificate, updated.

15. I cannot wait indefinitely for a new passport, as I will be traveling abroad with my family this summer on an important visit to my father’s home country. A member of my extended family passed away, and my family decided to use the inheritance money she left to hold a once-in-a-lifetime family trip to my father’s birthplace. My whole family is going, and most importantly, we are taking my grandmother, who is 83. She is slowing down with age, and this will probably be the last big trip she is able to make with all of us as a family, so it’s very important for me to be

there. My dad has told me that if I can't go on this trip, then it's not worth taking.

16. Because I don't want to miss this trip, I recently applied for a passport. I requested an update to my legal name, provided an updated photo, and requested the sex designation to be changed to "M." On May 2, I received a passport with the "F" sex designation. I am worried about what it will be like to travel with this document that shares private information, against my wishes, with anyone who looks at it. I am very worried that something like what happened when I voted last year, but much worse will occur during this trip with my family in July.

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, and harassment while traveling, especially while re-entering the country after my family trip.

18. I am also harmed by the Passport Policy emotionally and mentally. 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.

* * *

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

Executed on May 5, 2025

/s/*

*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.

Exhibit A

PHOTOGRAPH FILED UNDER SEAL