

Exhibit K

**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 ROBERT ROE IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

I, Robert Roe, 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 42 years old. I am a United States citizen and currently live in Europe.
3. I am employed as a Foreign Service Officer with the United States Department of State.
4. I am a man.
5. I am also transgender. I was assigned female at birth, but I have a male gender identity and live my life as a man.
6. Attachment A is a photo of me.
7. I was diagnosed with gender dysphoria in 2022 when I was 39 years old.
8. I have taken steps to bring all aspects of my life into conformity with my male gender identity, including steps to legally, socially, and medically transition.

9. I have lived and been known by others exclusively as male since 2022. I live a private life and don't share my transgender status with many people outside of a very small friend group.

10. At the same time that I was embarking on my medical transition in 2022 and 2023, I worked to quickly update my identity documents across an array of nations and states. This was because by virtue of my profession, I know the kinds of complications that can arise from inaccurate and outdated information on identity documents.

11. In the fall of 2023, I completed a legal name and gender change in my country of residence, which enabled me to update the name and sex designation on my driver's license and residency card. I also updated the name and sex designation on my personal use U.S. passport and shortly after I updated my name and sex designation with the Social Security Administration. Finally, in February of this year I updated my legal name and sex on my state birth certificate.

12. The only outstanding document that I need to update is my diplomatic passport, which expires in July 2025, roughly one month before I am scheduled to begin training associated with my new assignment with the State Department.

13. Because I was on leave and did not have an active assignment, I was not eligible to update the sex designation on my diplomatic passport until January 2025. This was exactly the same time that the State Department was directing passport officials to suspend applications requesting sex designation changes in accordance with the New Passport Policy.

14. Under the New Passport Policy, I will not be able to update the sex designation on my diplomatic passport. If I have to proceed to my new assignment with an incorrect sex designation on my diplomatic passport, it could frustrate or prevent me from receiving an official visa in my assignment country. If I can't receive an official visa, then I can't fulfill my assignment obligations, which could have a variety of negative consequences, for no other reason than the New Passport Policy mandates transgender people receive an incorrect sex designation on federal

issued identity documents.

15. If my host country does issue me a visa despite the incorrect sex designation, it will then be used to issue me a diplomatic ID, which serves as proof of my diplomatic status and is essentially my residence card while in the host country. I will then possess three official identity and employment verification documents that share my private and sensitive medical information with anyone who views them. I am incredibly fearful that this will expose me to additional scrutiny and surveillance, including harassment and discrimination that could jeopardize my ability to complete my assignment.

16. Having a diplomatic passport with an inaccurate sex designation on it will also present problems while traveling to other countries for assignment and other work-related duties. I would be required to show the passport to access hotels, car rental agencies, medical services, or to engage with other employees of the embassy or consular offices in that country. The countries I may be required to travel to may not be hospitable to transgender people. I am incredibly fearful of the consequences of having an inaccurate sex designation on my diplomatic identification that shares private and personal information which could be used to stigmatize and mistreat me.

17. I have served the United States honorably for almost 15 years as a foreign service officer and I want to continue in this position until I am eligible to retire. Public service has been a hallmark of my life, and I have been honored to serve the American people in various posts around the world, ensuring their safety and security and creating ongoing and positive diplomatic connections.

18. It is unfathomable to me that my impeccable record of service means nothing to the State Department and instead they would jeopardize my safety and career by requiring me to have an inaccurate sex designation on my diplomatic passport.

* * *

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

Executed on May 9, 2025



Robert Roe

ATTACHMENT A

PHOTOGRAPH FILED UNDER SEAL