

IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE
TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY

JANE DOE,)	
)	
Plaintiff/Petitioner,)	Case No. 24-0503-IV
)	
vs.)	
)	
TENNESSEE DEPARTMENT OF)	
SAFETY AND HOMELAND)	
SECURITY; JEFF LONG, in his)	
official capacity as the Commissioner)	
of Tennessee's Department of Safety)	
and Homeland Security; and MICHAEL)	
HOGAN, in his official capacity as the)	
Assistant Commissioner of the Driver)	
Services Division for Tennessee's)	
Department of Safety and Homeland)	
Security,)	
)	
Defendants/Respondents.)	

DECLARATION OF JANE DOE

I, JANE DOE, pursuant to Tenn. R. Civ. P. 72, declare as follows:

1. I am a Plaintiff in this action. I offer this Declaration in support of Plaintiff's Motion for Temporary Injunction. I have personal knowledge of the facts set forth in this Declaration and could and would testify competently to those facts if called as a witness.
2. I am a thirty-three-year-old woman and I live in Monroe County, Tennessee.
3. I am employed as a critical care Paramedic.

4. I moved to Monroe County, Tennessee approximately eight (8) years ago to be closer to my parents.

5. I was born in Florida and I have a Florida birth certificate.

6. I am a transgender woman. I was assigned male at birth but I have known I am female since the age of three (3).

7. I originally began my social transition when I was younger, in late 2012. I began using female pronouns and changed my appearance. I began wearing makeup and dressing in traditionally feminine attire.

8. I originally sought medical care as a young person before I left Massachusetts. However, when my mother learned I was planning to move to Tennessee, she stressed to me that it was a dangerous place for transgender people. Her concern for my safety caused me to abandon my earlier plans to undergo medical transition because I was afraid of violence in Tennessee.

9. After establishing myself in Tennessee, I continued to experience extreme gender dysphoria which caused me great distress and anxiety and again led me to seek out medical care. I was diagnosed with gender dysphoria in May 2022. Since that time, I have received treatment for gender dysphoria through hormone therapy which is monitored by my doctor. This medication causes me to have the same secondary sex characteristics as other women.

10. I began socially transitioning a few months before my diagnosis of gender dysphoria. I wore my hair in a traditionally female manner and began dressing in a more traditionally female way. Patients began correctly referring to me by female pronouns

although I didn't ask them to. This caused some of my coworkers to make jokes at my expense. Ultimately, I came out to my coworkers as being a transgender woman. I introduced myself consistently as "Jane" and asked people who already knew me to call me by that name.

11. I legally changed my name in November 2022 in the Probate Court for Monroe County, Tennessee, to better reflect my sex characteristics, including my gender identity, as female. When the court granted my name change, I felt ecstatic. I was finally being seen for who I am.

12. Since my legal name change, I began to update my name and gender on my government records. My United States passport now reflects my legal name and my sex characteristics, including my gender identity, as female. I've also updated my records with Social Security.

13. When I received my updated passport, I felt excited, proud and happy. I try to use it as much as I can because otherwise, I fear harm, harassment, and discrimination for being transgender if I show my Tennessee driver license.

14. I needed to update the sex designator on my Tennessee driver license, and so on February 23, 2024, I visited my local driver services center located at 150 Plaza Circle, Athens, TN 37303. The clerk at the driver license center referred to me correctly as a woman and treated me with courtesy and respect. I presented my old driver license, my United States passport, and two proofs of residency to the clerk and told her that I would like to renew my license and change my sex designator, as well as my eye color, on my Tennessee driver license.

15. The clerk spoke with her manager and then told me they could update my eye color on my driver license, but they could not update my sex designator due to a new Tennessee law that went into effect on July 1, 2023, despite my federal REAL ID compliant passport designating me as female. The clerk mentioned that they already had a copy of my birth certificate on file which designated my sex as male at birth, and so they could not change the sex designator to female on my driver license, even if I brought in a corrected birth certificate or a letter from my doctor.

16. I felt humiliated when I left the driver services center because my own state refused to issue me an accurate driver license that correctly reflected me as female. I felt upset that I couldn't have an accurate driver license like other people in Tennessee because of a private and personal medical condition. And I feared that the state did not seek to protect me due to the well-known violence and stigma that I face as a transgender woman, and I felt that the state's message to me was that I was not worth of protecting from harm and did not deserve the same dignity afforded to other driver license holders.

17. Without an accurate driver license, I don't believe it is possible for me to stay in Tennessee permanently without sacrificing my integrity, safety, privacy, autonomy, and dignity.

18. Most people in Monroe County know me because it is a small community, and so they know that I have transitioned. But it is very difficult to navigate through the rest of Tennessee or travel to another state because I am terrified of being targeted because I am transgender.

19. I have been harassed in the past when people learned I am transgender. I applied for a job before I legally changed my name and when I showed up for the interview and the interviewer saw that I am female but my identification didn't reflect that fact, the interview turned sour. The interviewer did not ask me any more questions and tried to end the interview as soon as possible.

20. I've consistently been called slurs during my life because of my female gender identity and my feminine characteristics.

21. I've been discriminated in the past many times for showing my driver license. As an example, one time I went to a liquor store and attempted to buy a product. When the store clerk saw my driver license, she refused to serve me. She told another store clerk that he could serve me, and referred to me using male pronouns, but said she would not sell to me. The other store clerk came over and finished my transaction. I felt humiliated and embarrassed that the store clerk was so offended by my existence that she would not interact with me or simply sell me the product like any other customer. I was also deeply embarrassed that this interaction happened in public within earshot of other customers.

22. I would like to keep my transgender status confidential in situations where I feel there is significant risk, such as being pulled over by the police in another county or having to use my identification to obtain medical care in another county. I would be afraid to produce my driver license in public outside of Monroe County. I try to use my passport wherever I can because it correctly lists my sex as female.

23. I am afraid that if I have to show my driver license to people, I might face violence. For instance, if I was alone and a stranger saw my driver license, I'm afraid that they would get violent and physically harm me or assault me. I also fear interacting with law enforcement in other places in Tennessee or in another state. I worry that I might be harassed if I was pulled over. I worry about strangers seeing my driver license and groping me to try to determine my sex because there is an inconsistency between my secondary sex characteristics and the sex designator on my driver license.

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

Dated: April 22, 2024



JANE DOE