

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

JANE DOE;)	
CHRISSY L. MILLER,)	
)	
Plaintiffs/Petitioners,)	Case No. 24-0503-III
)	
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 CHRISSY MILLER

I, Chrissy Lee Miller, pursuant to Tenn. R. Civ. P. 72, declare as follows:

1. I filed an amended complaint to join my co-Plaintiff, Jane Doe, as a Plaintiff in this action.
2. I offer this Declaration in support of my Emergency Motion for a Temporary Restraining Order. I have personal knowledge of the facts set forth in this Declaration and can testify competently to those facts if called as a witness.
3. I am a thirty-eight-year-old woman, and I live in a rural area outside Del Rio, Tennessee, in Cocke County.

4. I work seasonally as a white-water river rafting guide in the Great Smokey Mountains. Below is a picture of me working as a guide. I am the woman wearing a black helmet in the picture.



5. I am a transgender woman. I was assigned male at birth, but I have known I am female since around the age of five (5).

Social History

6. I was born in Cincinnati, Ohio and have an Ohio birth certificate.

7. I moved to Tennessee in 2014 and obtained a Tennessee driver license that same year.

8. I began publicly living as a woman in March 2023. At this time, I started using she/her pronouns, going by the name Chrissy, dressing and styling myself in a traditionally feminine way, and disclosing my identity as a woman to my social circle.

9. I have been diagnosed with gender dysphoria and am currently under the care of a licensed medical provider and licensed professional counselor.

10. I started receiving gender-affirming health care in the form of hormonal therapy in April 2023. This medication causes me to have the same secondary sex characteristics as other women, and more generally speaking, appear in a more traditionally feminine manner.

11. While I have known I was a woman since I was very young, my immediate family reacted negatively when I would display feminine traits as a child; as a result, it took me many years to finally tell my loved ones, including friends and co-workers, about my gender identity.

12. At the time I started to socially transition, I worked for an outdoor event-planning company. I worked for this company for nearly six years, in addition to my seasonal work as a river guide.

13. Many of my coworkers at the event-planning company reacted very negatively to my transition. One coworker told me not to transition because if I did, I “would have a death marker on my head.” Another coworker told me: “I can’t believe you are doing this.”

14. As I started to transition, people I interacted with became less friendly and avoided me.

15. Most harmfully, after I started to transition, the event-planning company moved me from working in the field during events, where I could engage with event

attendees, to working in the warehouse, which was not open to the public or event attendees. I was paid less for working in the warehouse.

16. Feeling like I had no other options, I quit this job. It made me incredibly sad to quit a job I loved, but I did not think I could continue working as a transgender woman in this hostile environment.

Efforts to Correct Legal Documentation of Sex

17. I legally changed my name to Chrissy Lee Miller in Cocke County Circuit Court on September 21, 2023.

18. On November 28, 2023, I petitioned the Probate Court of Hamilton County, Ohio for a correction of my birth record to change my sex designation from male to female.

19. As a result of my successful petition, I received an Ohio birth certificate listing my sex as female.

20. Nothing on the corrected birth certificate indicates that it has been amended, changed, or corrected at any time.

21. To the best of my knowledge, I should only use the birth certificate with the sex designation female in circumstances that require me to produce a birth certificate; the previous birth certificate with the sex designation male is now void and is kept under seal.

22. Correcting my birth certificate was part of a years-long legal process to change sex designations on all of my identifying documents to female.

23. To date, my United States passport, and social security card all identify me as female.

Efforts to Obtain Driver License in Tennessee

24. In or around mid-July of 2023, I went to the local driver license services center at 1220 Graduate Drive, in Sevierville, Tennessee, to request a change to the sex designator on my license from male to female.

25. I presented two letters—one from my medical provider and one from my counselor in support of my request.

26. An employee at the services center informed me that they could not grant my request “anymore” and that I would need a birth certificate that identified my sex as female if I wanted a sex designator of female on my driver license.

27. I left the services center feeling dejected but determined to take the necessary steps to obtain a correct driver license.

28. I undertook the difficult task of educating myself on the legal process to apply for a corrected birth certificate in Ohio. I traveled to Ohio and appeared in probate court on my own behalf without the assistance of a lawyer. The Court granted my petition, and I was given a birth certificate that identifies my sex as female.

29. On January 22, 2024, I went to the driver services center at 209 Gore Road in Knoxville. This time, I presented my birth certificate that identified my sex as female. I requested a corrected driver license with a sex designator of female.

30. The driver services employee initially began to process my request after seeing my corrected birth certificate.

31. Another employee approached and stopped the first employee from processing my request. I became upset at this point and do not recall exactly what the employees at the

driver services location were saying to me about my request because I was so upset. I recall, however, that they said I could not change the sex designator on my driver license. I left the services center.

32. An hour or two after I left the services center, a woman called my cell phone and identified herself as the manager of the driver services center. She addressed me with a hostile and accusatory tone.

33. The woman told me that she “saw” my previous birth certificate that identified my sex as male. The birth certificate had, according to her, been scanned into some database or electronic record-keeping system in 2014 when I originally applied for a Tennessee driver license.

34. I was extremely upset and scared by this phone call. I felt like I was being accused of having done something wrong, possibly criminal, by having requested a corrected driver license. I did not understand why the manager felt compelled to call my cell phone after I had already left.

35. The next day, on January 23, 2024, I went back to the driver services center in Sevierville, located at 1220 Graduate Drive. I showed my birth certificate that identified my sex as female and requested a correct driver license with the sex designator of female.

36. The employee at the Sevierville driver service center quickly processed my request without any issue.

37. I left the driver service center feeling elated—like I was floating after a huge weight had been lifted. My driver license was the last form of government-issued

identification that listed my sex as male. Clearing this final hurdle was one of the best moments of my life. I felt so confident in myself and my identity.

Threat to Cancel Driving Privileges

38. On April 24, 2024, three months after obtaining my driver license, I received a letter in the mail from Defendant Michael Hogan in his role as assistant commissioner of the driver services division.

39. The letter was dated April 16, 2024. It stated that my driver license was “issued in error” and that I had to surrender my driver license “within thirty (30) days of this letter” [sic].

40. If I do not surrender my license, the letter states that such failure will result in “cancellation of [my] driving privilege.”

41. I do not know whether I have thirty days from when I received the letter or thirty days from when the letter was dated to surrender my license. But I assume that I have at least until May 16, 2024—thirty days after the letter was issued—to surrender my license.

42. When I read the letter from Mr. Hogan, I was speechless. I have wept off and on for days because of how distraught I feel.

Need for Correct Driver License

43. I need a driver license and will face significant hardship without one. My daily life will become impossible to live without the ability to drive.

44. As I live in a rural area, I drive thirty minutes' distance to work every day and fifteen minutes' distance to buy food at the nearest grocery store. I drive several times a month to Nashville for medical treatment.

45. I had planned to apply for fulltime employment with my correct driver license in the next few weeks.

46. I recently attended a career workshop specifically created for transgender people that was hosted by the Orlando Pride Center. There, I learned about how to do things like update my resume and use LinkedIn.

47. Having a driver license with the sex designator of female will allow me to finally apply for jobs without having to disclose my transgender status.

48. Because I encountered hostility as a transgender woman at my last job, not disclosing my transgender status is extremely important to me when applying for new jobs.

49. If I surrender my correct driver license, I fear the confusion that could result because all of my other forms of government-issued identification list my sex as female. I worry how others will view me and worry they will think I am lying when I present conflicting documents.

50. I especially worry about being stopped by a police officer and having conflicting documentation as to my sex.

51. If I surrender my correct driver license, I fear physical and violent altercations might arise at any of the seemingly inconsequential moments I will have to use my driver license with the wrong sex designator—checking into a hotel, renting a car, ordering a

drink, entering a bar—and having to disclose my transgender identity, something that is deeply personal, whether I want to or not.

52. I have already updated my driver insurance, health insurance, and other official documents that require a driver license number with my driver license that was issued on January 23, 2024. If I surrender my license, I will have to change or update all of this information.

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

Chrissy miller

CHRISSY MILLER

Dated: May 1, 2024

Signature: 
Chrissy Miller (May 1, 2024 15:27 EDT)

Email: _____@gmail.com