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The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

SHILLING, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 2:25-cv-241

**DECLARATION OF REGAN
MORGAN IN SUPPORT OF
PLAINTIFFS' SUPPLEMENTAL
BRIEF**

I, Staff Sergeant (SSG) Regan A. Morgan, declare as follows:

1. I am a thirty-one-year-old Staff Sergeant in the United States Army. I have served in the U.S. Army for nearly 14 years.

2. In May 2021, I assumed my current role in the 5th Special Forces Group (Airborne) at Fort Campbell.

3. I am a Special Forces Medical Sergeant with the military occupational specialty (MOS) 18D.

4. I currently serve in Alpha Company, 2nd Battalion, 5th Special Forces Group. I was promoted to Staff Sergeant in November 2020, shortly before joining the 5th Special Forces Group.

5. I am presently deployed outside the United States in an active combat zone. I was

1 scheduled to remain in the active combat zone until approximately August 2025.

2 6. In 2019, I completed the Special Operations Combat Medics Course at Fort
3 Bragg, North Carolina. I subsequently graduated from the Special Forces Qualification Course
4 (also called “Q” course) in 2020, also at Fort Bragg, earning my Green Beret.

5 7. I have continued to enhance my skills by completing the Military Freefall
6 Parachutist Course (2021), Special Forces Advanced Urban Combat Course (2021), and the
7 Special Operations Target Interdiction Course Level 2 (2022).

8 8. Over the course of my career, I have held several leadership roles, including:
9 Team Leader in the National Guard (2015–2016); State Trainer for the Military Funeral Program
10 (2016–2017); and, for the past two years, Company Senior Medical Sergeant.

11 9. To the best of my recollection—I’m currently without access to my service record
12 as I am at a remote location with no computer access—I have received multiple awards, ribbons,
13 and commendations, including the Army Commendation Medal, Army Achievement Medal,
14 Army Overseas Service Ribbon, Global War on Terrorism (GWOT) Expeditionary Medal,
15 Global War on Terrorism (GWOT) Service Medal, NCO Professional Development Ribbon (2
16 awards), The Army Good Conduct Medal (2 awards), and Operation Inherent Resolve Campaign
17 Star, among other awards.

18 10. I am transgender and have been diagnosed with gender dysphoria.

19 11. I recognized I was transgender around 2018.

20 12. In 2019, I first sought guidance for gender dysphoria from behavioral health
21 professionals at Fort Campbell, and I was diagnosed with gender dysphoria by a behavioral
22 health provider in 2020.

23 13. During 2020 and through 2022, I attended a support group for soldiers with
24 gender dysphoria on Fort Campbell, and through that experience, I was able to create a
25 community of other trans service members that allowed me to grow more confident as a leader
26 and soldier.

14. In Summer 2022, I submitted a packet requesting command approval for my

1 gender-affirming care at Fort Campbell. By Fall 2022, I began medically transitioning as
2 approved by Col. Lindeman.

3 15. Throughout treatment for gender dysphoria, I have successfully maintained my
4 operational readiness and deployability as a Special Forces Medical Sergeant, and my gender
5 dysphoria has neither impacted my ability to serve in a combat role nor interfered with my
6 deployments.

7 16. Since starting hormone therapy, I have had no issues performing my duties in
8 combat zones.

9 17. In the combat zone where I currently serve, I am still able to receive gender
10 affirming care. I am able to transport and store my medication and administer a weekly injection,
11 which takes less than ten minutes a week.

12 18. Ongoing access to gender affirming care has improved my mental health,
13 bolstered my self-confidence, enhanced my effectiveness as a leader on my team, and has not
14 impacted my ability to perform my duties.

15 19. My current combat zone deployment was scheduled to continue through August
16 2025, but I discovered on or about the morning of March 2, 2025, that a flight had been booked
17 in my name for emergency leave—which I did not request.

18 20. After learning about the flight booking, I spoke to my leadership and was
19 informed by Sergeant Major Klein, my senior enlisted leader in 2nd Battalion, 5th Special Forces
20 Group, that I would be placed on emergency leave for five days from March 5, 2025 to March
21 10, 2025 and then begin “out-processing” out of the Army no later than March 26, 2025. I was
22 told my separation date—the date I would be forced out of the Army—would be no later than
23 April 26, 2025.

24 21. I was asked to sign a counseling form to this effect, which I have included as
25 EXHIBIT A.

26 22. I have since been removed from my forward operating base in a combat zone and
routed through different locations in the Central Command area of operations and am awaiting

1 transport to Baltimore, Maryland, and then to Fort Campbell for out-processing from the Army.

2 23. I did not request to be discharged from the Army, and I did not initiate the process
3 of discharge. I did not request to be removed from my combat zone deployment. Being
4 discharged in this manner would profoundly disrupt my life. I have not completed my civilian
5 degree and have focused primarily on my Army career. I rely on my military income and
6 healthcare, and losing both would cause severe financial and personal hardship.

7 24. My unit also stands to lose a highly qualified Special Forces Medic, leaving them
8 with only one medic on the team. Such a reduction severely impacts the readiness and mission
9 capability of our Special Forces unit, which is meant to operate with two medics. It would be
10 extremely difficult to replace me without impacting other soldiers' deployment rotations and the
11 overall effectiveness of the team.

12 25. I have about six to nine years remaining before reaching retirement eligibility,
13 depending on how my National Guard service is counted. If not for this policy-based action, I
14 would continue to proudly serve in the United States Armed Forces for the rest of my career. I
15 find the work immensely rewarding and have built a community among my fellow soldiers.

16 26. The ban on transgender service has forced an abrupt and involuntary end to a
17 career I love, tarnishing my record of honorable service and jeopardizing my future. My wish is
18 simply to remain in the Army, continue deploying with my unit, and fulfill my responsibilities to
19 my country and fellow soldiers.

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

21 DATED: March 4, 2025


Regan A. Morgan (Mar 4, 2025 21:21 GMT+3)
Staff Sergeant (SSG) Regan A. Morgan