

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA**

JOHN DOE, formerly known as JANE DOE,

Plaintiff,

v.

MICHAEL PENCE, in his official capacity as Governor of the State of Indiana; GREGORY ZOELLER, in his official capacity as Attorney General for the State of Indiana; and MYLA A. ELDRIDGE, in her official capacity as Marion County Clerk of the Court,

Defendants.

Civil Action No. 1:16-cv-02431-JMS-DML

Affidavit of Plaintiff John Doe

Comes now the plaintiff John Doe, being duly sworn upon his oath, and says that:

1. I wish to assert my rights in this Court by proceeding as the plaintiff in this case.
2. I was born in Mexico in 1985 and was granted asylum in the United States in August 2015. It is my understanding that I will not be able to naturalize until at least the year 2020.
3. I am a transgender man. My parents named me “Jane” and raised me as a girl, but I have lived as a man and gone by the name “John” since 2012.
4. Virtually all of my acquaintances and coworkers see me only as a man and do not know that I am transgender. My wife’s coworkers, friends, and family do not know that I am transgender. I work in a predominantly male environment and am friendly with my co-workers. However, they frequently make anti-LGBT comments and jokes, especially at times when LGBT

issues are featured prominently in the news. There is one openly gay person who works with me, and I have seen how they are treated differently and mocked behind their back.

5. I am pursuing this case because I cannot change my legal name. Because of that, my official identification still says “Jane,” which confuses people who see it and sometimes causes them to realize that I am transgender. This has led to situations like a prolonged traffic stop in 2011, during which the officer threatened to arrest me because of the name on my ID and referred to me as “it” to my then-girlfriend, and delays and mockery in trying to access medical care at an emergency room in 2013.

6. I believe that if my actual name is public during this lawsuit I may face the following harms:

- a. My coworkers will learn that I am transgender, and I will be subjected to ridicule and harassment in the workplace.
- b. I am aware that discrimination and violence against transgender people is all too common, as demonstrated by a number of surveys and studies. While I have not yet been subject to threats or physical attacks, I do live in fear of it, and I wonder what day might be the day that something happens to me.
- c. In the small community where I live, I fear that I will be ostracized or even physically attacked if it becomes widely known that I am transgender.

7. For these reasons, I wish to proceed in this matter under the name “John Doe.”

8. I want to prevent my actual name and identity from becoming known to the public.

However, I understand that if this motion is granted, my name will be disclosed to the defendants in this case.

Verification

I verify, under the penalty of perjury, that the foregoing representations are true.

Executed on: 9-13-2016.

9-13-2016
Date

John Doe
John Doe