

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

NICOLAS TALBOTT <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 1:25-cv-00240
	)	
UNITED STATES OF AMERICA <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**DECLARATION OF VERA WOLF**

I, Vera Wolf, declare as follows:

1. I am a 32-year-old Staff Sergeant and weapons specialist in the United States Air Force. I enlisted on or about April 11, 2017. I have served my country honorably for nearly eight years. I am transgender.

2. I began serving in the Air Force in explosive ordnance disposal. I later served as temporary command support staff, providing IT support to my Commander and her lieutenants and chiefs, before transitioning to my current role as a weapons specialist. In this role, I load ammunition on AC-130 gunships, among other duties.

3. In my time in the Air Force, I have been deployed overseas twice. I once deployed to Afghanistan between 2018 and 2019. Later, I redeployed to Afghanistan and was part of the final group of service members leaving the country as the U.S. drew down its presence there. I finished that tour in the Middle East in the United Arab Emirates, Kuwait, and Qatar.

4. In or about November 2019, I received a diagnosis of gender dysphoria. Following that diagnosis, I worked with my Air Force medical providers to develop a treatment plan. I am currently in the process of completing that treatment plan.

5. I have been living and serving as a woman for approximately two years.

6. I serve in a combat unit that is deployed to the front lines. Although this is a very dangerous and demanding position, throughout my treatment plan, I have never been non-deployable.

7. To complete my transition, my treatment plan requires two additional surgeries. I was scheduled to have one of those surgeries at the end of March. However, that surgery was cancelled shortly after Defendant Secretary of Defense Hegseth issued his January 28, 2025, memorandum halting medical care for transgender service members.

8. Because my treatment plan is not complete, I am currently serving as a woman under an Exception to Policy (ETP). My gender marker has not yet been updated in DEERS.

9. I have received awards including an Air and Space Commendation Medal, an Air and Space Achievement Medal, two Meritorious Service Medals, two Air Force Good Conduct Medals, a Global War on Terrorism Medal.

17. On March 3, I was informed by my First Sergeant that, because my ETP has been revoked, I will be required to adhere to male standards immediately.

18. I meet all standards applicable to female service members. I adhere to female grooming standards and use women's restrooms. Others refer to me as a woman.

19. It is not possible for me to serve in the military as a man, which I am not. I am a woman, look like a woman, and have used women's facilities since my transition without incident. It would be extraordinarily disruptive for me to use men's restrooms and showers, sleep in men's berthing units, or otherwise access sex-segregated facilities for men.

20. If others were required to refer to me by male pronouns or address me as "sir," it would cause confusion and disruption, negatively impacting my ability to effectively perform the

duties of my job.

21. I am unable to demonstrate that I have never attempted to transition to any sex other than my birth sex, because I have undergone a gender transition. Moreover, as stated above, I am unable to adhere to the standards associated with men, since I am a woman.

22. If I cannot serve as a woman in the military, I cannot serve at all.

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

Dated: March 3, 2025

  
Vera Wolf