

**IN THE UNITED STATES DISTRICT
COURT
FOR [APPROPRIATE JURISDICTION]**

CASE NO. [To Be Assigned]

ALL TRANSGENDER PEOPLE IN THE UNITED STATES, on behalf of
themselves and all others similarly situated,
Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States;
RELEVANT FEDERAL AGENCIES
; [OTHER ADMINISTRATION OFFICIALS],
Defendants.

1 CLASS ACTION COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

2 INTRODUCTION

1. Plaintiffs bring this action to challenge the systematic and unconstitutional discrimination against transgender individuals by Defendants, including policies and executive actions that deprive transgender people of equal protection under the law.
2. Plaintiffs seek declaratory and injunctive relief, as well as monetary damages, to rectify the harm inflicted by policies that restrict healthcare, employment, military service, and educational opportunities.

3 JURISDICTION AND VENUE

1. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343.
2. Declaratory relief is authorized under 28 U.S.C. §§ 2201 and 2202.
3. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2).

4 PARTIES

4.1 Plaintiffs

1. **Named Plaintiffs:** Individuals who have suffered direct harm.
2. **Class Definition:** “All transgender individuals in the U.S. harmed by discriminatory policies enacted or enforced by Defendants.”

4.2 Defendants

1. **Donald J. Trump**, in his official capacity as President.
2. **Federal Agencies**, including but not limited to:
 - Department of Defense (DOD)
 - Department of Health and Human Services (HHS)
 - Department of Education (DOE)
 - Department of Justice (DOJ)
3. **Administration Officials**, in their official capacities.

5 CLASS ACTION ALLEGATIONS

1. Plaintiffs bring this action under Federal Rule of Civil Procedure 23(a) and (b)(2).
2. The class is so numerous that joinder of all members is impracticable.
3. There are common questions of law and fact, including:
 - Whether Defendants’ policies violate the Equal Protection Clause.
 - Whether Defendants’ actions violate Due Process under the 5th Amendment.
 - Whether Defendants’ policies violate Title VII, Title IX, and the Administrative Procedure Act.

6 LEGAL CLAIMS

6.1 COUNT I – VIOLATION OF THE EQUAL PROTECTION CLAUSE

1. Defendants’ policies discriminate against transgender individuals based on sex and gender identity, violating the 14th Amendment.

6.2 COUNT II – VIOLATION OF DUE PROCESS

1. Defendants’ policies deprive transgender individuals of fundamental rights without due process of law.

6.3 COUNT III – VIOLATION OF THE ADMINISTRATIVE PROCEDURE ACT

1. Defendants enacted policies in an arbitrary and capricious manner, violating the APA.

6.4 COUNT IV – VIOLATION OF TITLE VII

1. Defendants have facilitated and enforced employment discrimination based on gender identity.

6.5 COUNT V – VIOLATION OF TITLE IX

1. Defendants have rolled back protections for transgender students, leading to discrimination in education.

6.6 COUNT VI – WRONGFUL DEATH AND EMOTIONAL DISTRESS CLAIMS

1. Defendants' policies have contributed to increased mental health crises, suicide rates, and physical harm.

7 DAMAGES AND RELIEF REQUESTED

7.1 A. Injunctive and Declaratory Relief

1. Immediate cessation of all discriminatory policies.
2. Restoration of all transgender-inclusive protections and programs.

7.2 B. Compensatory and Punitive Damages

1. Plaintiffs seek damages for:
 - Lost wages and career opportunities due to employment discrimination.
 - Medical expenses and mental health costs due to healthcare restrictions.
 - Increased homelessness and financial hardship due to policy-driven discrimination.
2. Plaintiffs seek punitive damages to deter future discrimination by government actors.

8 JURY DEMAND

1. Plaintiffs demand a trial by jury on all issues so triable.

9 ATTORNEYS' FEES AND COSTS

1. Plaintiffs seek attorneys' fees and costs under 42 U.S.C. § 1988.

10 PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request that this Court:

1. Declare Defendants' policies unconstitutional.
2. Issue a nationwide injunction stopping enforcement of discriminatory policies.
3. Order immediate restoration of legal protections for transgender individuals.
4. Award compensatory and punitive damages in an amount to be determined at trial.
5. Grant attorneys' fees and any other relief this Court deems just and proper.

Respectfully submitted,

[ATTORNEY NAME]

[LAW FIRM]

[ADDRESS]

[EMAIL]

[PHONE]