

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

EDMUND DI LISCIA, et al.,

Plaintiffs,

v.

LLOYD JAMES AUSTIN III, et al.,

Defendants.

Civil Action No. 1:21-cv-01047-TJK

**DECLARATION OF
DOMINQUE BRAGGS**

I, ABF3 Dominique Braggs, pursuant to 28 U.S.C. § 1746, state and declare:

1. I am over eighteen years of age and, if called to testify at a hearing in this matter, can and will competently testify to the following facts of which I have personal knowledge.

2. I am an Aviation Boatswain's Mate – Fuels 3rd Class Petty Officer. I previously served aboard the USS George Washington, which was in drydock for the duration of my service. I am now serving in Norfolk, Virginia.

3. After living in accordance with the Islamic faith since 2017, I converted to Islam in 2020 with the assistance of Navy Chaplain Abuhena Saifulislam. Every day, I strive to observe the tenets of the faith by studying the Quran, praying five times a day, and abstaining from alcohol. I also observe Islam's various fasts as best as I can while in the Navy. I believe that it is sinful and spiritually degrading not to maintain a beard that complies with my religious obligations.

4. I am African American, and I suffer from a common skin condition called *pseudofolliculitis barbae*, which causes painful inflamed skin and razor bumps when I shave.

This condition is especially common among African American men.

5. Since boot camp, I have had a partial beard because of medical no-shave chits, which I have been granted roughly every 30-60 days because of this skin condition.

6. Since joining the Navy, I have sought a religious accommodation to maintain a beard in accordance with my Islamic faith. The Navy denied my request in December 2020, and I have appealed but have not yet received a final answer.

7. I know a lot of Sailors, mostly of African-American background, who have medical waivers for their beards.

8. I have never heard of any Sailor being asked to shave his medical beard just because he was deployed or at sea.

9. I have never been deployed, but from what I have heard it is fairly common for commanders to allow all hands to grow their beards while deployed or otherwise at sea.

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

Executed this 13th day of August, 2021.



Dominique Braggs
ABF3 USN