

**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
LEANDROS KATSAREAS**

I, MC3 Leandros Katsareas, 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 a Mass Communications Specialist, currently stationed aboard the USS George Washington where I am in the Media Department as a Public Affairs Specialist. The USS George Washington is currently stationed at Newport News shipyard in Virginia.

3. As a young man studying in Qatar, classmates from the U.S. who recognized my passion for liberty encouraged me to study the Founding Fathers and the Constitution. During my study, I fell in love with the United States because of her commitment to freedom, justice, and equality. I decided to move to the U.S. and become a citizen so that I could serve in the military and defend constitutional freedoms.

4. I am a devout Muslim and have practiced my faith since the age of 16, when I converted because I was drawn to the principles of justice and free will inherent in the faith.

5. Throughout my time in the Navy, I have continued observing Islamic tenets and practices to the fullest extent that I can. Specifically, I study the Qur'an, pray five times daily, try to maintain a *halal* diet and fast regularly.

6. One of Islam's ten basic *fitras* (cleanliness and grooming obligations) requires Muslim males who are genetically able to grow a substantial beard as a sign of their devotion to God. For virtually my entire adult life prior to shipping out to Navy Recruit Training Command at the age of 31, I maintained a beard in accordance with my religious beliefs.

7. Since joining the Navy, I have sought a religious accommodation to maintain a beard in accordance with my Islamic faith. I believe that it is sinful and spiritually degrading not to maintain a beard that complies with my religious obligations.

8. In 2016, I wore a full beard for an entire six- to seven-month deployment aboard the USS Nitze. The overwhelming majority of my fellow male Sailors had a no-shave chit for this period of time. We purchased the chits at the beginning of the deployment and were only required to shave when in port.

9. The ability to purchase these no-shave chits had been a Navy-wide practice for Sailors while at sea or otherwise deployed. They were often referred to as MWR no-shave chits.

10. Beyond no-shave chits, there are thousands, if not tens of thousands, of Sailors who wear beards for medical reasons. Many of them are African American due to the high rates of razor bumps among that population.

11. Sailors with beards for medical reasons are waived from the requirement to shave, even while deployed.

12. While I was deployed aboard the USS Nitze, I was aware of multiple Sailors with medical waivers.

13. The only time I have ever heard of Sailors with medical conditions being asked to shave was for photos taken for the cruise book so that our appearances would be more uniform.

14. I currently have a religious accommodation for a full beard pending the outcome of this litigation. I have been required to stand watch on numerous occasions, after I was released from the Auxiliary Security Force.

15. Since getting the accommodation for a full beard, I attended Advanced Shipboard Firefighting School, where we donned all of the necessary PPE gear, including respirators and tanks, and where we fought real fires in a simulator. I was able to maintain the seal on my Scott SCBA mask, even though that was not necessary due to the positive-pressure the mask uses to keep all particulates out, even in the event of having no seal.

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

Executed this 13th day of August, 2021.



Leandros Katsareas
MC3 USN