

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

JANIAH MONROE, MARILYN MELENDEZ,)
EBONY STAMPS, LYDIA HELENA VISION,)
SORA KUYKENDALL, and SASHA REED,)

Plaintiffs,)

v.)

No. 18-cv-156-DRH-DGW

BRUCE RAUNER, JOHN BALDWIN,)
STEVE MEEKS, and MELVIN HINTON,)

Defendants.)

**DEFENDANTS’ RESPONSES TO
PLAINTIFFS’ FIRST SET OF INTERROGATORIES**

NOW COME Defendants, JOHN BALDWIN, STEVE MEEKS, and MELVIN HINTON, by and through their attorney, LISA MADIGAN, Attorney General of the State of Illinois, and pursuant to Federal Rule of Civil Procedure 26 and 33, hereby provide their responses to Plaintiffs’ First Set of Interrogatories, stating as follows:

INTERROGATORIES

1. Identify with specificity all IDOC policies and procedures governing or relating to medical treatment for gender dysphoria provided to prisoners in IDOC custody.

RESPONSE: See Defendants’ Objection to Interrogatories. Subject to and without waiving said objections, see attached:

- **IDOC Administrative Directive, BATES #005220-005225.**
- **Facility Institutional Directives, BATES #005063-005225.**
- **IDOC Standard Operating Procedure (SOP) Manual for Mental Health, BATES #0055221-005654.**

2. Identify all individuals with knowledge regarding all IDOC policies and procedures governing or relating to medical treatment provided for gender dysphoria and each individual's role in the creation or implementation of the IDOC policies and procedures.

RESPONSE: See Defendants' Objection to Interrogatories.

3. Identify (by name, inmate number, and facility) all prisoners currently in IDOC custody who have identified as transgender or sought treatment for gender dysphoria (whether or not they used the phrase "gender dysphoria" in their request for treatment).

RESPONSE: See Defendants' Objection to Interrogatories. Subject to and without waiving said objections, spreadsheets identifying each transgender inmate at each facility for May 2018, June 2018, and July 2018 are attached hereto as BATES #004175-004255.

4. Identify by name and title all members of the GID Committee from its inception to present, and the timeframe during which each member was on the GID Committee.

RESPONSE: See Defendants' Objection to Interrogatories. Subject to and without waiving said objections, the current Transgender Committee consists of: (1) The Agency Medical Director, Dr. Steve Meeks; (2) The Chief of Mental Health, Dr. Melvin Hinton; (3) The Agency Transfer Coordinator, Doug Stevens; and (4) The Agency Chief of Operations, Sandy Funk.

Other attendees of the Transgender Committee include the Chief of Psychiatry for the Illinois Department of Corrections, along with the individual facilities' mental health staff, Medical Directors, Healthcare Unit Administrators, Directors of Nursing, Assistant Wardens of Programs, and Wardens.

A list of mental health staff who treat transgender inmates is attached hereto as BATES #005659.

A list of other individuals who may attend Transgender Committee meetings as of June 2018 is attached hereto as BATES #005655-005658.

5. State with specificity the medical or other qualifications to treat gender dysphoria held by any individual who was or is a member of the GID Committee.

RESPONSE: See Defendants' Objection to Interrogatories. Subject to and without waiving said objections,

Current Members:

- **Melvin Hinton - Licensed Clinical Psychologist**
- **Steven Meeks - Licensed Physician and Surgeon**
- **William Puga - Licensed Physician and Surgeon**

Past Members:

- **Louis Shicker - Licensed Physician and Surgeon**

Respectfully submitted,

JOHN BALDWIN, STEVE MEEKS, and
MELVIN HINTON,

Defendants,

LISA MADIGAN, Attorney General
State of Illinois

Attorney for Defendants,

By: /s/ Kyle A. Rockershousen
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CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2018, the foregoing document, **Responses to Plaintiffs' First Set of Interrogatories**, was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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