

EXHIBIT 7

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,) Case No.

vs.) 18-CV-156-DRH-DGW

BRUCE RAUNER, JOHN BALDWIN,)

STEVE MEEKS, and MELVIN)

HINTON,)

Defendants.)

Videotaped Deposition of DR. SHANE REISTER

Chicago, Illinois

Friday, April 19, 2019 - 9:01 a.m.

Reported by:

ELIA E. CARRIÓN, CSR, RPR, CRR, CRC

Job No. 25002

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1 outward LGBT movement, I will go into more details
 2 about what that event was, like that was the
 3 Stonewall uprising.
 4 And I'll describe what actually happened
 5 when that occurred. And it basically started off
 6 some very visible LGBT rights movement. And so I'll
 7 go into more details about these more general topics
 8 for Part 1.
 9 Q. All right.
 10 (WHEREUPON, discussion was had off
 11 the record.)
 12 Q. (By Mr. Knight) And so if you just take
 13 a look at Slide No. 3 --
 14 A. Yes.
 15 Q. -- this is -- this is, I assume, a
 16 PowerPoint?
 17 A. Yes.
 18 Q. And so I believe you said this -- you
 19 haven't started -- this is just developed, you're
 20 not -- you haven't actually done this training?
 21 A. This was presented to the -- one very
 22 similar to this was presented to the wardens, to all
 23 the wardens at their latest wardens' meeting. I
 24 forgot the date of when that was, but that was only

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1 like a month or two ago.
 2 I took their feedback and their
 3 questions. And they asked to make sure that the --
 4 basically, to word things that were a little
 5 scientific and to provide some context that might be
 6 a little easier for people to learn. So I updated
 7 some of the slides, trying to simplify the concepts
 8 and using, like, analogies and things like that so
 9 that it was a little more accessible. Because the
 10 scientific terms alone, they didn't feel was
 11 accessible enough.
 12 And so I updated. These are the slides
 13 that were updated from the feedback I received from
 14 the wardens. And I also added at the very end of
 15 these slides commonly asked questions. Because they
 16 asked for commonly asked questions, like a -- a Q
 17 and A, question-and-answer section.
 18 Q. Okay.
 19 A. So I added those commonly asked
 20 questions.
 21 Q. Okay. And then looking at page 3,
 22 there's a reference to internationally recognized
 23 standards of care. Is that the WPATH Standards of
 24 Care?

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1 A. Yeah, that's the WPATH standards.
 2 Q. And on page -- let's see. I guess it's
 3 Slide 49? And this talks about language.
 4 A. Yes.
 5 Q. And -- and so this would be -- this would
 6 be a reference to things like misgendering?
 7 A. Yes.
 8 Q. And using terminology -- certain kinds of
 9 offensive terminology for transgender individuals is
 10 what --
 11 A. Yes.
 12 Q. So do you talk to them about what things
 13 should not be -- what kinds of specific things
 14 should not be said to prisoners?
 15 A. Yes. Let me -- let me look at the slide.
 16 'Cause there's a specific slide that I talk about
 17 basically things that we have to make sure we
 18 address. There's a slide that specifically states
 19 that. I've just got to find it.
 20 Q. Well, No. 50, if you'll look at that
 21 one --
 22 A. Yeah. It's --
 23 Q. -- so No. 50 --
 24 A. Yes, I'm --

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1 Q. -- this talks about how misgendering is
 2 psychologically harmful, stressful, and interferes
 3 with treatment?
 4 A. Yes.
 5 Q. Okay. And that's something that you have
 6 talked -- have said to the wardens? Was this a part
 7 of what you showed the wardens?
 8 A. Yes.
 9 Q. But it's -- it's something you intend
 10 to -- to say to all staff?
 11 A. Yeah. The only changes that we are gonna
 12 do if -- and we may launch it just as-is if we can't
 13 get it done before -- we already basically are
 14 setting the dates for the -- the training. I'm --
 15 I'm going to try to go through -- 'cause there's a
 16 typo in here. I wrote couch instead of coach on
 17 some -- one of the slides.
 18 And then we're going to clean up. And
 19 basically, like on this slide where it has a period
 20 after pronoun and after woman, after he-she, I'm
 21 going to eliminate the punctuation on that.
 22 So there are some grammatical punctuation
 23 things that we're going to try to get done, as long
 24 as it doesn't mess up the audio. There was some

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1 'cause I read it when I was -- I read it verbatim
 2 when I was doing the slides. So what's written
 3 there is probably what's missing off of here.
 4 Q. Okay. Okay. Well, in terms of medical
 5 interventions, what is it that the Department of
 6 Corrections provides?
 7 A. We provide hormone treatment for gender
 8 dysphoria. And then we haven't yet to, but we have
 9 not ruled out, if gender dysphoria symptoms are not
 10 abated, use of other procedures as well, such as
 11 surgeries.
 12 Q. Okay. But you -- you haven't provided
 13 surgery at this point?
 14 A. Not at this point, but it is -- not that
 15 it is not available.
 16 Q. Looking at Slide 74, so this references
 17 searches, but it doesn't reference the -- the gender
 18 of the person who should be conducting this search.
 19 A. The department --
 20 Q. Is that -- is that right, what I -- what
 21 I just said?
 22 A. Yes. It doesn't specifically state the
 23 gender. What this is talking about is PREA
 24 standards where you have to have a single person

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1 doing the search.
 2 Q. Well, the PREA standards also talk about
 3 cross-gender searches, don't they?
 4 A. I don't know the quote of where that
 5 would be, but -- so --
 6 Q. So the -- so the -- this doesn't
 7 address --
 8 A. It doesn't address.
 9 Q. -- it doesn't address the gender of the
 10 searching. It doesn't prohibit transgender women
 11 being searched by men?
 12 A. It does not specifically address that
 13 issue.
 14 Q. And does the committee address that?
 15 A. That is addressed from a site level. It
 16 is done by the gender that would normally do it,
 17 given the circumstance of the facility. Both men
 18 and women are authorized to do searches in both the
 19 male and female division, and the -- each site has a
 20 standard that they generally will use. And that's
 21 decided at the site level. Offenders are allowed to
 22 file a grievance form for review -- for
 23 administrative review if there's a concern.
 24 Q. About the gender of the -- of the

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1 individual conducting searches?
 2 A. Correct.
 3 Q. So you're saying that in male facilities,
 4 men would be conducting the searches?
 5 A. Yes. In general, it would unless there
 6 was a specific change that would be based on a -- an
 7 offender grievance or an emergent situation where
 8 they would need multiple genders doing the searches.
 9 Q. And -- and what do you mean by "multiple
 10 genders doing the searches"?
 11 A. If there was an emergency and we had to
 12 quickly evacuate, for example, we -- we reserve the
 13 right to be able to have either gender do searches
 14 so as long as they're following professionalism.
 15 And everybody's been trained on professionalism --
 16 Q. Okay. But how --
 17 A. -- who would be doing that.
 18 Q. Right. But outside of that emergency --
 19 A. Uh-huh.
 20 Q. -- you're saying that a woman who's
 21 transgender in a male facility will be searched by
 22 men?
 23 A. Yes.
 24 Q. And is that -- that's not something the

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1 committee addresses? Is that what you're saying?
 2 A. That's not something that we would
 3 address.
 4 Q. Isn't that a part of social transition?
 5 A. That is determined -- has been determined
 6 that this is a security matter that's being driven
 7 by meeting of PREA standards, in terms of searches.
 8 Q. Looking at Slide 94, so the question
 9 asks: Aren't offender --
 10 (Court reporter clarification.)
 11 Q. (By Mr. Knight) The question asks:
 12 Aren't offender who say for the first time they are
 13 transgender just faking to get something?
 14 A. Uh-huh. Yes.
 15 Q. And is that an issue that happens at the
 16 facilities, that facility staff think that someone's
 17 faking?
 18 A. I haven't heard official kinds of
 19 comments like that. What I will generally hear when
 20 people know that I, you know, work with this kind of
 21 training and what have you is they ask questions
 22 about whether or not individuals are just faking.
 23 Some of them will ask, well, do they just
 24 want to go over to the female division, they're not