

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

JANIAH MONROE, MARILYN)
MELENDEZ, LYDIA HELÉNA VISION,)
SORA KUYKENDALL, and SASHA)
REED,)

Plaintiffs,)

v.)

Civil No. 3:18-cv-00156-NJR-MAB

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

Defendants.)

DECLARATION OF LYDIA HELENA VISION

I, Lydia Heléna Vision, hereby state:

1. I am a 39-year-old woman. I was raised in Granite City, Illinois. From a young age, I knew that I was a girl. I felt like a girl on the inside and expressed myself in a feminine way. When I was a child, I attempted to cut off my penis. My family used to tell me that I needed to “man up” and “act more masculine.” Because of my family’s lack of support, I hid my femininity and transgender identity until years later.

2. I entered IDOC custody in June 2004. I have taken advantage of the educational opportunities offered by IDOC, earning my associate’s degree while in custody. I was transferred to Danville Correctional Center in December 2015 so that I could continue my education. I am currently in Centralia Correctional Center, where I am taking a paralegal certificate course. I hope to help and advocate for other transgender people in the future.

3. In 2015, while I was at Danville, I informed IDOC personnel that I am transgender and was diagnosed with gender dysphoria in March 2016. At that time, I began requesting

treatment for gender dysphoria, including hormone therapy, female clothing such as a bra and female underwear, and gender-affirming grooming items. Despite my diagnosis, IDOC repeatedly denied these requests. IDOC staff instead told me I had to attend sessions for post-traumatic stress disorder before being treated with hormone therapy.

4. In July 2016, I was referred to an IDOC psychiatrist who evaluated me via Skype and confirmed the prior diagnosis of gender dysphoria. During the evaluation, the psychiatrist also confirmed that my continued lack of hormone therapy was causing me extreme distress and recommended I have a medical follow-up meeting to talk about starting hormone therapy. Despite this second diagnosis and evaluation, which confirmed what I had already told IDOC about the severity of my gender dysphoria and my need for hormone therapy, IDOC refused to provide me with any treatment. IDOC did not provide hormone therapy, surgery or gender affirming clothing. Instead, my “treatment plan” consisted of monthly counselling sessions with counselors who misgendered me (referring to me as a man) and were unfamiliar with transgender issues.

5. I was also forced to continue showering in general population for several months after my confirmed gender dysphoria diagnosis. In both August and September 2016, I requested a private shower arrangement so that I did not have to shower with male prisoners and to help keep me safe. During this time, I suffered a panic attack in the showers.

6. In November 2016, I again requested—and IDOC refused to provide—treatment for my gender dysphoria. At this time, I attended individual therapy sessions with staff unfamiliar with transgender issues and received no treatment specific to gender dysphoria. IDOC staff said they would reconsider treating my gender dysphoria once I “developed a peer group for support” and went to regular therapy.

7. Although Danville did not have a transgender therapy group for some time, once a transgender group was started, I attended the sessions. I also attended regular therapy sessions and requested more materials for information related to gender dysphoria. I joined Black and Pink, an outside organization that supports LGBTQ inmates and made an effort to reach out in writing to other transgender people and a family friend.

8. While waiting for gender dysphoria treatment, I tried to do whatever was in my control to feel more feminine and reconcile my appearance with my gender identity. For example, I followed a special weightlifting regimen to try to enhance the size of my breasts, and I did whatever I could to remove my body hair and pluck my eyebrows. But, I felt increasingly depressed and anxious because it felt like a façade; it is so difficult to feel feminine without access to hormone treatment and feminine products.

9. In February 2017, I filed three grievances requesting treatment for my gender dysphoria, including hormones, gender-affirming clothes and grooming products, and placement in a cell with another transgender inmate because I feared for my safety. As part of my request for gender-affirming products, I requested a bra, women's underwear, feminine grooming products, makeup, and body hair removal products like waxing strips. IDOC acknowledged and denied my request for a bra, but ignored the rest.

10. In March 2017, IDOC's Gender Identity Disorder Committee again refused to provide me hormone therapy and gender-affirming clothes and grooming products. Despite multiple medical diagnoses supporting my gender dysphoria, repeated requests for treatment, my diligence in attending counselling, and my efforts to find support within the transgender community, IDOC denied treatment for the same reasons they gave before. After I was denied treatment, I continued trying to do what I could to feel feminine, but without treatment I sank into

severe depression and anxiety. Every day, I looked in the mirror and saw a woman with a five o'clock shadow and a body that I hated but could not change without the treatment I was being denied. I quit my job in the laundry room because I felt too depressed to continue working.

11. In October 2017, I was evaluated by another psychiatrist. IDOC's continued refusal to provide me hormone treatment and access to feminine items was causing me extreme distress, and I was feeling severely depressed. The psychiatrist recommended that I be considered by IDOC for hormone therapy, recognizing that hormone therapy would likely improve my mood and anxiety. However, after the evaluation and recommendation, I still did not receive hormone therapy or gender affirming products. I told my family and friends about my transition and was happy to receive replies addressing me by my preferred name, Lydia. I continued to meet monthly with staff for counselling, and during almost every meeting I pleaded for hormone therapy. I grew increasingly discouraged and depressed. I could not understand why I was still being denied treatment.

12. In January 2018, I was evaluated by another psychiatrist. We discussed at length my need to access hormone treatment and feminine products. I was again diagnosed with gender dysphoria, as well as anxiety and depression. The psychiatrist discussed prescribing antidepressant medication, but did not provide a medical treatment plan for my gender dysphoria.

13. By March 2018, two years after my initial gender dysphoria diagnosis, I still had no access to hormone therapy or feminine products. I felt depressed and I started to feel hopeless about ever receiving treatment for my gender dysphoria.

14. I was transferred to Graham Correctional Center in May 2018, and I felt somewhat hopeful that Graham might be different from Danville. I thought maybe I would finally get the treatment I need in order to feel like I belong in my body. In June 2018, a psychiatrist at Graham

evaluated me. I expressed my need to transition fully to living as a woman and my disgust with my body. The psychiatrist confirmed my gender dysphoria diagnosis for a fourth time. A month later, in July 2018, I still did not know whether or not my case would be presented before the Committee for approval of hormone therapy. As a result, my anxiety and depression worsened, and I had trouble eating and sleeping.

15. In August 2018, I was sent for bloodwork without any further explanation from IDOC. At the end of October 2018, a Mental Health Professional (“MHP”) told me that I was finally approved by the Committee to begin hormone therapy.

16. As of December 2018, it had been 32 months since my first diagnosis in IDOC custody. Over those 32 months, I was diagnosed with gender dysphoria multiple times. I made over 20 requests for hormones to IDOC medical personnel and staff. I made multiple requests for female items such as a bra, female underwear, and other feminine products. Several doctors recommended I receive hormone therapy. For me, the delay has been excruciating. In late 2018, I finally began receiving the hormone therapy that I had requested for so long. I received two bras on February 2, 2019, over three months after they were prescribed and over two years since my first request. The bras IDOC ordered are the wrong size and cut into my ribs when I wear them.

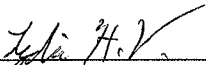
17. Even though I have finally been approved for hormone therapy, I am terrified that I will never actually receive the treatment I need. I see other transgender inmates who show little to no signs of development even though they have been on hormone therapy for years or who go long periods of time without being monitored. I have had trouble accessing information about my treatment and have had problems with prescription changes and getting the correct dosage. I am exhausted from having to fight with IDOC for years to get any treatment for my gender dysphoria.

All these years without hormone therapy and gender-affirming clothing and items made me want to kill myself.

18. Every day I am forced to dress, smell and look like “a man” because I cannot get the gender affirming clothes, grooming items and medical care I need. IDOC personnel and medical and mental health staff persistently misgender me. I feel hopeless and completely alone in a constant battle for treatment. It is so painful to watch my facial hair grow knowing there is nothing I can do. IDOC’s refusal to provide me proper treatment for my gender dysphoria including appropriate placement in a women’s facility is torture for me. I know that gender dysphoria is the cause of many emotional problems for me, and I feel sick that I have no way of doing anything about it. I am trapped in a male prison where I do not feel safe and I am not fully able to transition. Because I am in a male facility, when IDOC searches me I get searched by a man. If I were in a women’s facility I believe that these kinds of searches would be performed by women. To have a male touch me makes me feel sick—my anxiety goes through the roof and I have no way to control it. I have to dissociate myself. If I allowed myself to feel I would be crying all day because I am a woman in stuck in a male facility.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.

Dated: 4/25/19



Lydia Heléna Vision