

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

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

Plaintiffs,

v.

JOHN BALDWIN, STEVE MEEKS, and
MELVIN HINTON,

Defendants.

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

DECLARATION OF MARILYN MELENDEZ

I, Marilyn Melendez, hereby state:

1. I am a 24-year-old woman. I grew up in Waukegan, Illinois. From a young age, I knew that I was a girl. As a child, I often went into my mother's room and tried on her clothes and makeup. I attempted to pierce my own ears. When my mother asked me whether I preferred to play with toys for boys or girls, I always chose the ones I thought were the girls' toys. While many of my family members tried to make me dress and "act like a boy," my mother was supportive of my female identity.

2. I took estrogen and a testosterone blocker in my pre-teen years. My ability to get hormones was interrupted when I was 13 because my mother could no longer afford them. My mother warned me that my body would start changing as a result. I became extremely depressed and suffered from serious anxiety when my body began to change and become more masculine in appearance because of puberty. I became distraught when my shoulders began to broaden and I started experiencing more frequent erections; I no longer looked and felt like myself. I felt

confused and upset by the changes in my body, and the teasing from other kids led me to stand up for myself and get into fights.

3. I entered the juvenile detention system at age 14. The juvenile detention facility denied me access to hormone therapy. When I turned 17, I was transferred from the juvenile facility to the IDOC adult prison system.

4. I was diagnosed with gender dysphoria by an IDOC medical professional in March 2015. I explained to an IDOC mental health professional how my stress and depression related to feeling trapped in the wrong body, and my severe discomfort and distress that I was unable to remove my facial hair and how deep my voice was at the time. Despite a diagnosis of gender dysphoria, the GID Committee initially refused my request for hormone therapy because, as I understood their explanation, there were no records of my prior hormone therapy and they believed I needed additional counseling before initiating hormone therapy. I filed a grievance to protest the fact that IDOC refused to provide me with hormone therapy. In my grievance, I pleaded for the people in charge to consider what they would want if a loved one was transgender and requesting treatment. During the time when I was unable to access hormone therapy, I felt extremely depressed about my body. I wrote in my grievance that without treatment I would rather be dead so that my pain and heartache would be no more.

5. After waiting several months, I eventually was able to start on hormone therapy. While the hormone therapy did help my suffering, to this day I still do not believe that I am receiving the proper dosage of hormones, and I have inquired about receiving a different type of hormone therapy than the one I am prescribed. I filed a grievance seeking a higher hormone dosage in June 2016, or clinical testing to confirm whether my dosage was too low, and repeatedly requested an increased dosage from IDOC medical personnel. As of August 2016—almost 1.5

years after IDOC diagnosed me with gender dysphoria—I still had erections when I would wake up as well as excessive face and body hair—leading me to believe that my dosage was insufficient. These things made me feel extremely depressed and disgusted; I did not want to be the person I saw in the mirror. IDOC did not take my request seriously and still does not regularly test my hormone levels to make sure I am on the right dosage to be safe and to treat my gender dysphoria effectively.

6. Shortly after beginning hormone therapy in the fall of 2015, I requested a bra from IDOC. When I still had not been provided a bra by June 2016, I filed a grievance to obtain one. I explained that not having a bra is linked to back strain, depression, and suicidal thoughts, and that the lack of a bra made the movement of my breasts more noticeable and led to increased harassment. It was not until June of 2017 that IDOC finally provided a bra.

7. Even with hormone therapy and a bra, however, I continue to be denied medical treatment that I believe would ease my suffering and gender dysphoria. I continue to be repulsed by my genitalia and by the amount of facial and body hair that I have. I have requested access to better hair removal, including a non-electric razor that I can use in the shower to shave my body, but have not been provided with one.

8. I also have requested gender-affirming surgery, and filed a grievance requesting it, but it does not seem like IDOC takes my request or my need for surgery seriously. I was told that IDOC does not perform gender affirming surgery, and despite my many requests I have never even been evaluated for surgery. I feel disgusted that I have male genitalia – it makes me feel like a freak or abomination when I see my body. I would rather kill myself than be forced to live in a man's body for the rest of my life.

9. I am not truly able to experience life as a woman in my current circumstances at IDOC. I am not allowed to wear any female clothing or undergarments except for the sports bra I was issued. I have had limited support for dealing with being a transgender woman in a men's prison, and I filed a grievance asking for access to gender-affirming commissary items as well as for additional counseling programs for transgender inmates. Both inmates and IDOC staff, including medical staff, are disrespectful of my gender identity. Most mental health professionals I have seen do not seem to know much about treating gender dysphoria at all. Some officers refer to me as "Ms." or use female pronouns, but others consistently refer to me with male pronouns, and will sometimes use offensive terms like "fag" or "sissy," which to me is disrespectful and dehumanizing. During strip searches, I am searched by male officers who have cupped my breasts or butt and called me names like "bitch" or "whore." Being placed in a female facility, and getting good medical care for my gender dysphoria, including gender-affirming surgery, would mean that I would finally be recognized as the woman I am.

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

Dated: 5/2/2019

/s/ Marilyn Melendez

Marilyn Melendez