

**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 SASHA REED

I, Sasha Reed, hereby state:

1. I am a 27-year-old woman raised outside of Chicago, Illinois. When I was three years old, the Department of Child and Family Services (“DCFS”) took me away from my mother after a fire broke out in our home. My aunt adopted me in 1999. Two years later, I was sent to Maryville Academy, a residential institution for children who have experienced abuse, located in Des Plaines, Illinois. I was later moved to Allendale Association, another residential institution for children who have experienced abuse, in Lake Villa, Illinois. Around 2004, while I was living at Allendale Association, I started to identify and present in private as female, and I told a therapist that I felt I was female. In 2011, I was moved to a transitional living program in Chicago, Illinois. By that time, I was consistently presenting as female in private, but not in public.

2. I entered the Illinois Department of Corrections (“IDOC”) in July 2013. During the intake process at Stateville Correctional Center, I told a female corrections officer that I am transgender. However, IDOC never referred me to a Mental Health Professional (“MHP”) at

Stateville, and my gender dysphoria was left untreated. Because I was not getting treatment, I tried to hurt myself on several occasions, including a suicide attempt in July 2013.

3. In March 2015, I was transferred to Menard Correctional Center. In November 2015, I told a MHP that I am transgender and requested hormone therapy. The MHP asked me to fill out a questionnaire and told me that it would be reviewed by IDOC's Gender Identity Committee ("GID Committee"). In February 2016, the GID Committee denied my request for hormone therapy because they said they needed to "rule out a psychotic process." The GID Committee, along with the MHP, misdiagnosed my gender dysphoria as schizophrenia. The GID Committee told me I had to wait six weeks while they investigated my "conceptualization of gender identity." Instead of six weeks, IDOC made me wait sixteen months before finally starting hormone therapy in March 2017.

4. During the months I waited to receive hormone therapy, my MHP told me that the GID Committee was reviewing my request, but there were delays because the GID Committee often cancelled their meetings. My MHP also told me that I was required to be off of Zoloft, Sertraline and Loxitane for before I started hormone therapy to evaluate any psychotic behaviors or symptoms. Even after I stopped taking these medications for over 3 months and showed no psychotic symptoms or behaviors, the GID Committee did not approve hormone therapy.

5. In December 2016, I filed a grievance requesting gender-affirming surgery, private shower accommodations, feminine grooming and cosmetic products, and a bra. While I was given access to a private shower, IDOC denied the rest of my grievance because the GID Committee should be the one making recommendations regarding my care, rather than my MHP. However, the GID Committee did not address these requests. My MHP told me I was not allowed to have a bra until I was on hormone therapy.

6. In February 2017, I filed an additional grievance requesting feminine grooming products and a bra. My grievance was denied because these things were not considered a “medical necessity” and because I was in a male facility.

7. In March 2017, the GID Committee approved hormone therapy after a sixteen-month delay from the date I first requested it.

8. In June 2017, I was transferred to Lawrence Correctional Center, where I was designated as vulnerable and housed in a single cell. I felt unsafe and uncomfortable in any unit. The sexual harassment and lack of treatment for my gender dysphoria made me feel unsafe and overwhelmed, and I was placed on crisis watch. While the hormone therapy did make me feel less depressed and anxious, to this day I still do not believe that I am receiving the proper dosage of hormones. I have repeatedly made requests to increase my hormone dosage, including when I was on crisis, but my requests were denied. IDOC does not routinely perform bloodwork to monitor my hormone levels to make sure they are safe and effective to treat my gender dysphoria.

9. I experience constant harassment from other inmates, who make sexual comments to me, try to grab my body, and ask to touch my breasts. In October 2017, I filed a Prison Rape Elimination Act (“PREA”) complaint about this harassment.

10. Around March 2018, I was removed from crisis watch and returned to general population housing. I regularly took hormones, attended school, and did not have thoughts of self-harm. I requested to be removed from vulnerable status so that I would be able to get a job and have a cellmate. My primary MHP advised me to submit a written request, but explained that the process would take time. I am still classified as vulnerable, making it difficult for me to get a job. I also have not been assigned a cellmate and often feel lonely and very isolated. I believe that my gender identity contributes to my lack of options regarding jobs and cellmates.

11. In April 2018, I requested a new primary MHP because I did not believe my current MHP was properly addressing my needs and requests regarding my hormone dosage and options for jobs and cellmates. I was told that I must continue to work with my current MHP, even though the MHP seems to know very little about how to treat gender dysphoria.

12. I also have requested gender-affirming surgery, and filed multiple grievances requesting it, but IDOC has not taken any of my requests seriously. Despite my requests and grievances, I have never even been evaluated for surgery. I hate having male genitalia because I feel like I am in the wrong body. I am desperate to have surgery because I believe it will make me feel less depressed about my body.

13. It is extremely hard for me not to receive the treatment I need to be able to experience life as a woman at IDOC. Even with hormone therapy and a bra, I continue to be denied additional medical treatment that I believe would help my gender dysphoria. I continue to be extremely disturbed by my genitalia. I am housed in a male facility, regularly searched by male guards, and am not allowed access to gender-affirming grooming items. I am not allowed to wear any female clothing or undergarments except for a bra. Both inmates and IDOC staff are consistently disrespectful of my gender identity, calling me by male pronouns and a male name. There are only a couple of officers that refer to me as a woman. I am continuously sexually harassed by inmates. I often feel unsafe because I am housed in a male facility. I believe that I would be able to live as a woman and without harassment and threats in a female facility.

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

Dated: 04-25-19



Sasha Reed