

**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 SORA KUYKENDALL**

I, Sora Kuykendall, hereby state:

1. I am a 26-year-old woman. I grew up in Columbia, Illinois. From a young age, I knew that I was a girl. I first identified as a girl when I was around five years old and I asked my family to call me by my preferred feminine name at the time, Kaitlyn. My brother began to bully me for using a girl name and expressing myself in a feminine way. Because of this bullying, I tried to hide my identity and stopped trying to present as a girl.

2. I was 11 or 12 when I finally had a way of describing what I was feeling with my gender identity. But my family thought I was going through a phase, and they were in denial about the reality of my female gender. During my teenage years, I kept my gender identity hidden due to repeated bullying by my family and classmates. I grew my hair long and was often perceived as a girl, but I never told people I was a girl. Because of my family's lack of support, I was not evaluated by a medical professional for my gender dysphoria or prescribed hormones during my teenage years. I became extremely depressed when my body began to change and become more

masculine in appearance because of puberty. During my teenage years, I attempted suicide because of the despair I felt from being trapped in a man's body.

3. I entered IDOC custody in November 2014 at the age of 22. During intake at Menard Correctional Center, a social worker asked me, "You're a boy, right?" I responded that I was not a boy, and within the first week of my incarceration, I asked for hormone therapy and explained that I wanted to present as a woman and receive the right medical care to make my body match my gender.

4. IDOC officials denied my request for hormone therapy and refused to evaluate me for gender dysphoria. The feeling of being trapped inside the wrong body was agonizing. In the midst of my despair, I attempted to castrate myself by tying my testicles in order to stop the flow of testosterone. It was only after my castration attempt that IDOC finally evaluated me and diagnosed me with gender dysphoria in February 2015.

5. I began taking hormones on approximately February 28, 2015. I was prescribed 100 mg of Spironolactone and 5mg of Menest to take daily. My prescribed hormone dosages have fluctuated since then. For example, in October 2015, my dosage of Spironolactone was increased to 200 mg.

6. I have repeatedly requested that IDOC officials conduct blood and laboratory tests to monitor my hormone levels to make sure that I am receiving the appropriate hormone dosages to support my transition and keep me healthy. Despite my repeated requests, I have never received regular monitoring or bloodwork.

7. In June 2015, I requested a bra due to my breast development. I did not receive one until six months later. I have repeatedly requested other gender affirming clothing and grooming

items. I also filed formal grievances requesting feminine grooming and cosmetic products and women's clothing. All of my requests have been ignored or denied.

8. Even with hormone therapy and a bra, I continue to be denied medical treatment that I believe would ease my suffering and gender dysphoria. I continue to be disturbed by my genitalia and by the amount of facial and body hair that I have. I have resorted to using nail clippers each morning to painfully remove the individual hairs on my face. I have requested hair removal treatment, but IDOC has not provided it.

9. I have also made repeated requests for gender affirming surgery. I first requested surgery in June 2015, and have continued to raise the issue with IDOC officials. I spoke with IDOC mental health professionals on at least three different occasions from 2016-2017 about surgery, and filed a grievance requesting it to treat my ongoing distress and gender dysphoria. One IDOC mental health professional said she would advocate for me to receive gender affirming surgery. Despite my repeated requests, I have never even been evaluated for surgery. Even though I am currently taking hormones, I continue to feel extremely depressed and anxious because of my genitalia, and have frequent thoughts of self-harm. I believe that surgery would make me feel less depressed and distressed.

10. During my incarceration at Menard, I have also been subjected to inhumane search procedures. Strip searches conducted by male officers in the presence of male inmates are humiliating and leave me feeling violated and unsafe. I have refused visitors because I was terrified of the violating experience of being searched by male officers. I filed a grievance on March 14, 2017 requesting that if strip searches are necessary, that I be strip-searched by a female guard away from the male inmates. I have not received a response to this grievance, and I continue to be subjected to these distressing searches.

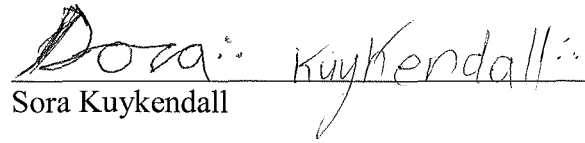
11. I am not truly able to experience life as a woman in my current circumstances at IDOC, and my mental and physical health are suffering because of it. IDOC has also denied my repeated requests to legally change the name on my birth certificate to accurately reflect my true gender identity. I am housed in a male facility for men and am not allowed access to gender affirming grooming items and clothing that are available to other women. I am not allowed to wear any female clothing or undergarments except for the sports bra I was issued. Both inmates and IDOC staff are consistently disrespectful of my gender identity, using male pronouns and my old male name or “it” to refer to me. Even the mental health professionals (“MHP’s”) and other medical staff often misgender me. They do not seem to know very much at all about treating gender dysphoria.

12. I feel unsafe on my cell block and I’m verbally harassed on a daily basis because I am a woman in a men’s facility and am targeted in multiple ways. This harassment makes me fear for my physical safety and it is dehumanizing. I eat all my meals in my cell because I am afraid of being harassed, attacked, or even raped.

13. Every day my requests for gender affirming surgery, hormone monitoring, gender affirming clothing, and being able to be myself in a women’s facility go ignored, I feel myself slipping into a deeper depression. I am struggling with constant thoughts of self-harm because IDOC continues to deny me medical treatment I need for my gender dysphoria.

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

Dated: 4/26/19

  
Sora Kuykendall