IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA TALLAHASSEE DIVISION

REIYN KEOHANE, et al.	:	
	:	
Plaintiffs,	:	
	:	
V.	:	Case No. 4:24-cv-434-AW-MAF
	:	
RICKY D. DIXON, in his	:	
official capacity as Secretary	:	
of the Florida Department of	:	
Corrections; CLAYTON WEISS	:	
in his official capacity as Health	:	
Services Director of the Florida	:	
Department of Corrections;	:	
GARY HEWETT, in his official	:	
capacity as Warden of	:	
Wakulla Correctional Institution,	:	
	:	
Defendants.	:	

DECLARATION OF SASHA MENDOZA

My name is Sasha Mendoza. (My legal name is George Mendoza). I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, pursuant to 28 U.S.C. § 1746, I declare:

 I am a 58-year-old transgender woman in the custody of the Florida Department of Corrections ("FDC"). I am currently incarcerated at the Dade Correctional Institution ("Dade CI").

- 2. I have known my gender identity is female since age 15.
- 3. I began socially transitioning and going by the name Sasha in 1993.
- 4. In 1985, I was committed to the custody of the FDC.
- 5. In July 2020, after extensive testing at Martin Correctional Institution and Wakulla Annex, I was diagnosed with gender dysphoria. They approved me for female clothing, hair-length, and canteen items. They wanted me to wait for one year before starting hormone therapy. I began wearing underwear, growing my hair long, and wearing cosmetics.
- 6. I love wearing make-up. Even though I can only do it inside the dorm, I would look forward to being able to wear it. It makes me feel more like a woman. I feel better and don't feel like a man.
- 7. On July 21, 2021, I was evaluated again, and my diagnosis of gender dysphoria was affirmed, and it was recommended that I begin hormone therapy to alleviate my gender dysphoria.
- 8. In 2022, I began hormone therapy for my gender dysphoria, under the recommendation and care of licensed medical professionals.
- 9. Being able to receive hormone therapy and follow female clothing and grooming standards has made it possible for me to live as the woman I am and, thus, alleviated the painful distress of gender dysphoria. It makes me feel human, like I'm normal; without it, it makes me feel like I'm being forced to

live something I'm not. When I was able to wear the proper clothing my depression and anxiety went down. Now they've taken it away, my depression has gone through the roof.

- 10.One time my hormones were delayed by nine days, and it threw me in a tailspin. Depression hit me really hard, and I was crying a lot. The doctor explained to me that it was because of the delayed hormone treatment.
- 11.Since September 30, 2024, my self-esteem, anxiety, depression, loss of appetite, sleep, and thoughts of suicide have been worse. It feels like I am not living but only existing.
- 12.On September 30, 2024, all transgender inmates at Lake Correctional Institution, where I was in custody, were escorted to the mental health office and taken to a conference room full of FDC officials. We were told there was an FDC procedure change, and we had 30 days to surrender our canteen items, to cut our hair, and the future of our hormone therapy treatment was unknown—they did not know if I would be taken off of hormones cold turkey or weaned off, saying an evaluation would determine what happens. When I asked Major Wyatt who ordered or made this FDC policy change, he stated "Governor Ron DeSantis."
- 13.After the announcement at Lake CI, Dr. Mesa examined me and gave me a medical pass for a bra for breast support. The pass is valid for one year.

- 14.I have not been reevaluated for hormone therapy treatment. The Warden at Lake CI said we would be reevaluated within 45 days, but no one that I know of has been reevaluated. Since I have been at Dade CI, no one has mentioned anything about reevaluation.
- 15.I have submitted numerous informal and formal grievances regarding the policy change and the denial of my treatments for gender dysphoria. I received denials for some of my grievances and I am waiting on responses for the others. I have appealed the denials and am waiting on responses to all of my appeals.
- 16.If they took away my hormone therapy treatment, I would be ready to end my life. I'm at that point. It may sound drastic. But FDC just let me start my transitioning and I was doing so well, and now they are making me stop. I'm halfway there and halfway not there.

I, Sasha Mendoza declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

Dated: <u>11/25/2024</u>

/s/ Sasha Mendoza Sasha Mendoza