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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO**

**JANE ROE, JANE POE, JANE DOE,**

*Plaintiffs,*

v.

**RAÚL LABRADOR, et al.,**

*Defendants.*

Case No.

**JANE ROE  
DECLARATION ISO  
PLAINTIFFS' MOTION FOR A  
TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY  
INJUNCTION**

I, Jane Roe,<sup>1</sup> hereby declare as follows:

1. I offer this Declaration in support of Plaintiffs' Motion for a Temporary Restraining Order and Preliminary Injunction.
2. I have personal knowledge of the facts set forth herein, and could and would testify competently to these facts if called as a witness.
3. I am a Plaintiff in this action. My name is Jane Roe. I am proceeding under a pseudonym because I fear for my safety.
4. I was assigned male at birth, but I have always known I was a woman.
5. I am currently incarcerated at Idaho State Correctional Center ("ISCC") in Boise Idaho. I have been incarcerated since 2014 and anticipate being incarcerated until 2033.
6. Growing up on a cattle ranch in Idaho, I didn't think too much about my gender identity. I was always one of the girls. I have always worn feminine clothes, with my parents assuming I was just going through a phase that I would grow out of. As a young girl I asked people to call me by feminine names and have gone by my feminine name since I was 12 or 13 years old. I even was permitted to use a staff bathroom while in school so I wouldn't have to use the men's restroom.
7. I always participated in traditionally feminine activities. Although I couldn't play softball as someone assigned male at birth—and would have had to play baseball—I did play on the women's volleyball team. I could do so because there wasn't a boys team at my school. I traveled with the team and, though I had to change into my uniform on the bus, otherwise I was treated as just one of the girls. I even was a cheerleader and wore the associated uniform and skirt.

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<sup>1</sup> Plaintiff Jane Roe will file a motion for a protective order and for leave to proceed using these pseudonyms because she fears for her safety.

8. Because I was assigned male at birth, I was teased for being one of the girls. I remember being called slurs by people at school. I tried to ignore this most of the time.

9. Eventually, around the age of 13, someone called me trans. I went home and looked up what being transgender meant. At the time, the information was confusing and sexualized. I was devastated by what I found at the time. I felt that I was not just a normal girl like I had thought, but instead I was a freak who seemed to deserve the abuse that I suffered at school.

10. I tried to commit suicide that day. I took a large amount of Vicodin and asked my niece, who was the same age as me, not to tell anyone. After I lost consciousness, she contacted my older sister who was able to take me to the hospital. I was admitted to a psychiatric program after that.

11. At the time, the doctor suggested using puberty blockers to my family, but they were not supportive. So, I was not able to begin gender affirming medications until I was an adult. Though, I was so desperate to begin gender affirming medical transition that I used unprescribed birth control as a means of hormone therapy.

12. Even so, the first time I was arrested, I was placed in a women's cell block based on my physical appearance. Only when I was bailed out did the facility realize that I had been assigned male at birth.

13. I arrived in an IDOC facility, ISCI, for the first time in 2014. While I was still in the Reception and Diagnostic Unit, a clinician who specialized in gender dysphoria, Jeremy Irvin, told me that I would be initially placed in Unit 16 with other transgender individuals and that I could be formally evaluated for gender dysphoria.

14. I met with Irvin three times, he said that I qualify for a gender dysphoria diagnosis and submitted my diagnosis to the Management and Treatment Committee and a committee I only knew as "ARC." My diagnosis of gender dysphoria was approved.

15. While in the facility, I received numerous informal citations for using makeup or wearing my hair in feminine styles.

16. I was able to begin hormone therapy under the direction of an IDOC doctor, Guillac, in 2015. Since 2017, when I was moved to ISCC, I have been under the care of Dr. Marvin Alviso, who I see about once a year. I also have my blood work tested about every 90 days. I currently receive estradiol and spironolactone.

17. I was able to see breast growth quickly. It felt so liberating to have my body finally develop in the ways I felt it should have been all along. I felt a sense of peace and internal tranquility as my body moved closer to who I had always been inside.

18. I know that no medication will fix my past or erase the times when I felt ostracized by being who I am, but my hormone therapy has brought my body into alignment with my mind and soul. It has given me hope for a better life, a better future, and a better me. It has been validating. I feel like I am not the freak I felt I was at 13. I am someone worth loving and accepting as myself.

19. I have also been told by Clinical Supervisor Lopez that I qualify for gender affirming surgery. However, I was told June 11, 2024 that due to HB 668, I would not be able to be scheduled for gender affirming surgery.

20. I first learned that HB 668 may affect my gender affirming medical care when I saw a couple of female legislators discussing it on KTVB News. It is my understanding that

because of this new law, I may be cut off from my medical treatment on or near July 1st of this year.

21. I filed a grievance and exhausted my administrative remedies over the imminent termination of my medical treatment.

22. I have been told by medical staff within the prison that they will not be able to provide my hormone therapy medications or schedule me for gender affirming surgery beginning July 1st, 2024.

23. I take my hormone therapy orally twice a day (morning and evening).

24. If I am cut off from my medication it would be emotionally and physically devastating. I will have psychological effects from my hormone imbalance and will experience irreparable damage to the feminization I have been able to achieve after being on hormone therapy for a decade.

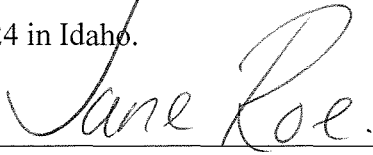
25. I am familiar with at least nine other people who use gender affirming hormone therapy in ISCC alone. I am familiar with at least fourteen other people in the process of starting, or desiring to start, hormone therapy at ISCC.

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[signature page follows]

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 27,  
2024 in Idaho.

A handwritten signature in cursive script that reads "Jane Roe." The signature is written in black ink and is positioned above a horizontal line.

Jane Roe