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*To be admitted *pro hac vice*

Attorneys for Plaintiffs

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

I, Jane Doe,¹ 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. My name is Jane Doe. I am proceeding under a pseudonym because I fear for my safety.

4. I was assigned male at birth, but I am a transgender woman.

5. I am currently incarcerated at Idaho State Correctional Institution ("ISCI") in Boise, Idaho. I have been incarcerated since 2023 and anticipate being incarcerated in Idaho for several more years.

6. I have battled to understand and accept who I am my entire life. When I was younger, I felt distressed about being treated like a boy. I gravitated towards wearing girls' clothes and playing with Barbies. I used to lay in bed and see an image of myself in a cage, dressed very femininely. This image followed me for years. I came to see it as myself, a woman, and I decided that I needed to let her out.

7. As an adult, I began wearing feminine clothes and stuffing my bra to go to work. I had intense anxiety about how people would perceive and treat me. I would walk down the street, paranoid that everyone was staring at me.

8. When I finally made the decision to seek gender affirming medical care, my whole life changed. My anxiety disappeared. Even before my body started changing, I felt surer of myself knowing that my body would change to reflect the person I had always been inside.

¹ Plaintiff Jane Doe will file a motion for a protective order and for leave to proceed using these pseudonyms because she fears for her safety.

9. In 2020, before I was incarcerated, my general care physician diagnosed me with gender dysphoria.

10. I began gender affirming hormone therapy, in the form of intramuscular injections of Estradiol and Spironolactone shortly after. I received this therapy for three years before my incarceration in Idaho.

11. After starting the hormone therapy, I finally started feeling like myself. I felt that my decision to be myself, despite any backlash from people who didn't approve of my being transgender, gave me armor. I knew that I was on the path I was supposed to be on, and I was just happy to be myself. My anxiety decreased. I finally was able to hold a job. I got my first apartment. My quality of life drastically improved.

12. When I was first arrested in 2023, I was not able to access my hormone therapy in county jail. During that time many of the physical changes brought about by the hormone therapy started to fade, and I experienced intense dysphoria. During this time, I checked my appearance in the mirror obsessively, so much so that it became exhausting. I had difficulty sleeping at this time.

13. It is my understanding that IDOC requires me to be diagnosed with gender dysphoria by one of their physicians before restarting hormone therapy in prison. Once I was moved to an IDOC facility, a doctor visited me in the Reception and Diagnostic Unit. He discussed my gender dysphoria diagnosis with me and told me he would write a report on my condition to be approved by the Management and Treatment Committee, after which I could receive my hormone therapy in the facility.

14. One to two months later, I received word that the Committee had approved my gender dysphoria diagnosis. The facility clinicians scheduled and performed a blood test. And I

was scheduled to meet with Dr. Marvin Alviso, for the prescription on my hormone therapy medications.

15. I met with Dr. Alviso about one month later and was prescribed Estradiol and Spironolactone. I was able to receive these prescriptions about one week later. I have now been back on these medications for approximately three months.

16. Immediately upon restarting my therapy, my dysphoria decreased. I no longer felt compelled to look in the mirror throughout the day. I stopped asking my friends for validation of the femininity of my appearance. I knew my breast tissue was regrowing and that the feminizing effects were taking place.

17. However, in the past three months, I have not yet regained the positive effects of my hormone therapy after the lapse upon my incarceration. My testosterone still seems high. My testicular volume has not decreased again with the restarting of my medication.

18. On May 28th, 2024, I learned about HB 668 and its potential impact on my medication. 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.

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

20. On June 13, 2024, I was told by ISCI's Clinician, Summers, that I would be either cut off or tapered off my hormone therapy medications beginning July 1st, 2024. The same day the transgender people who use hormone replacement therapy in the facility, including me, received a memo asking us to gather for a meeting the following week to discuss the changes in ISCI's ability to provide gender affirming medical care.

21. At the June 20th meeting, the Warden, Head of Security, and Head of Medical told the transgender individuals there that, due to HB 668, we would be either cut off or tapered off our hormone therapy.

22. I am aware of eleven transgender individuals receiving hormone therapy, and another three transgender individuals in the process of receiving hormone therapy, at ISCI.

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

24. I am concerned about the negative impact this will have on my physical, mental and emotional health. Although I am thrilled to be back on my hormone therapy after the lapse, I am still dealing with aftereffects from that time. I believe that if I am not able to continue my prescribed hormone replacement therapy that my gender dysphoria and subsequent depression will get worse.

25. I have suffered so much because of this condition and am finally starting to feel more like myself. Losing that would be devastating.

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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.

Jane Doe

Jane Doe