

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

REIYN KEOHANE, et al.	:	
	:	
<i>Plaintiffs,</i>	:	
	:	
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,	:	
	:	
<i>Defendants.</i>	:	

DECLARATION OF MICHELLE WARD

My name is Michelle Ward. (My legal name is Matthew Ward). 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:

1. I am a 53-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 between ages 8 and 10.
3. I began socially transitioning—wearing female-typical clothing, hairstyles, and cosmetics—at age 15.
4. I have been in the custody of the FDC since 1992, when I was 20 years old.
5. I was diagnosed with gender dysphoria by Dr. Gascon at Dade C.I. on May 23, 2019.
6. I was approved for gender dysphoria accommodations on June 26, 2019, by the Gender Dysphoria Review Team (GDRT). I received a GDRT accommodations form that indicated that I could follow the female hair length rule, have female undergarments, have female canteen items such as makeup and hair care products, and receive hormone therapy.
7. On September 18, 2019, I began hormone therapy for my gender dysphoria, under the recommendation of Dr. Gascon.
8. I have been receiving hormone therapy ever since.
9. Prior to October 30, 2024, I wore my hair to the middle of my back. I started growing it in January of 2019. I also wore a bra, female undergarments, hair accessories and make-up every day.
10. Being able to receive hormone therapy and follow female clothing and grooming standards was life changing. I had struggled with gender dysphoria my whole life. After receiving treatment, I started to feel whole for the first

time in my life. Throughout my life, I tried multiple times to castrate myself and have experienced suicidal ideation. I tried to cut my penis off when I was 10. After receiving treatment, those thoughts subsided and became more bearable.

11. On September 30, 2024, at 8:30 a.m., all of the transgender inmates at Dade C.I. were gathered and told by Ms. Dobson of Health Services of a new health services bulletin that stripped us of our diagnosis and all of our gender dysphoria accommodations.

12. During that gathering, we were told medical would evaluate our physical need for a bra.

13. During that gathering, we were also told we had 30 days to cut our hair to male standards and turn in female undergarments, makeup, hair care items, and canteen items, and if we didn't, we would be locked up and force would be used to bring us into compliance. They passed out papers telling us all of this and we were told we had to sign them or would be put in confinement.

14. During that gathering, we were also told we would be reevaluated for gender dysphoria within 30 days.

15. My breasts were evaluated by medical on October 10 and I was told I did not qualify for a bra. I have a B cup.

16. On the last of the 30 days, I was given a direct verbal order to get my hair cut.

As I sat in the chair getting my hair cut, I cried the whole time.

17. That same day, I handed in all of my female underwear and makeup and other prohibited female items.

18. The loss of my hair, along with female undergarments and makeup, has been earth-shattering for me. The thoughts about self-castration and suicidality that I experienced before treatment came flooding back like a tidal wave. I stay awake crying many nights.

19. I feel naked and humiliated without a bra.

20. I have not yet been reevaluated for gender dysphoria by FDC staff.

21. I submitted informal grievances regarding the policy change and denial of clothing and grooming accommodations. I also submitted formal grievances on the same issues. They were denied, I appealed, and the appeals were also denied.

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

Dated: 11/25/2024

/s/ Michelle Ward
Michelle Ward