

EXHIBIT C

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

REIYN KEOHANE, SASHA :
MENDOZA, SHEILA :
DIAMOND, KARTER JACKSON, :
NELSON BOOTHE, :

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, :
ALONZO HORNER, in his :
official capacity as Warden of :
Homestead Correctional Institution; :
and NAN JEFFCOAT, in her official :
capacity as Warden of Florida :
Women's Reception Center, :

Defendants. :

DECLARATION OF REIYN KEOHANE

My name is Reilyn Keohane. 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 in support of Plaintiffs' Motion for Class Certification:

1. I am a 31-year-old transgender woman serving a fifteen-year sentence in the custody of the Florida Department of Corrections ("FDC"). I am currently incarcerated at the Wakulla Correctional Institution ("Wakulla CI"), specifically in the Wakulla Annex, located in Crawfordville, Florida, and my DC number is Y55036.
2. I submit this declaration based on my own personal knowledge and if called as a witness, I could and would competently testify.
3. I am one of the named plaintiffs in this lawsuit.
4. I am experiencing severe harms because of the change in the FDC's policies for the treatment of individuals with gender dysphoria. The withdrawal of clothing and grooming accommodations that allowed me to socially transition has exacerbated my gender dysphoria. And because of the policy change, I fear that despite having received hormone therapy for years it will be discontinued. Being forced to present as a man and the stress of knowing my hormone therapy could be stopped at any time have caused serious harm to my mental and physical health. I am experiencing an increase in gender dysphoria symptoms, which had been alleviated by hormone therapy and the

ability to socially transition. I am experiencing depression, anxiety, social isolation and having thoughts of taking my own life as well as the urge to self-harm. Since experiencing the constant fear and associated stress about my treatment, I have been suffering from severe headaches, insomnia, fatigue, lack of energy, and body aches.

5. Since age 12, I knew that my gender identity was female, and it did not align with my male-assigned sex at birth.
6. At age 13, I began seeing a psychiatrist and a therapist. From age 14, I began presenting as female and socially transitioning, including wearing female-typical clothing, hairstyles, and using cosmetics to express my gender identity.
7. At age 16, I was diagnosed by a licensed medical professional with Gender Identity Disorder.
8. At age 17, I legally changed my name to “Reiyn” to conform with my gender identity. I had been using the name Reiyn socially prior to the formal legal name change.
9. I began hormone therapy in August 2013, when I was 19 years old and started taking Estrace (estradiol) and Aldactone (spironolactone) under the recommendation and care of licensed medical professionals.

10. In September 2013, I was arrested and taken into custody at Lee County Jail.

Officials at the Lee County Jail refused to provide hormone therapy despite my repeated requests to continue care.

11. In July 2014, I accepted a plea deal of 15 years. I accepted the plea deal with the understanding that I would be provided hormone therapy after being transferred to FDC custody. Maintaining hormone therapy was a deciding factor in my acceptance of the plea.

12. I entered FDC custody on July 17, 2014. Soon after entering FDC custody, I requested treatment for my gender dysphoria, both hormone therapy and the ability to dress and present myself in accordance with my female identity. I requested this treatment and raised this issue repeatedly—in numerous conversations with FDC medical and mental-health officials, and through informal and formal grievances and appeals—and across multiple FDC institutions. But each time, I was denied.

13. Although FDC healthcare officials confirmed my gender dysphoria diagnosis, FDC denied me all treatment besides mental-health counseling.

14. I also had, at times, been using bras and makeshift female undergarments, but these were confiscated. I was told that such clothing was unauthorized in a male institution.

15. During that time, I experienced significant harm from being without hormone therapy and access to female clothing and grooming standards. For example, while at DeSoto CI, I attempted to hang myself, and I attempted self-castration.
16. Because my numerous grievances and my constant pleading with FDC officials to provide medical care were unsuccessful, I obtained legal representation for help and attorneys filed a lawsuit on my behalf on August 15, 2016, to compel the FDC to treat my medical needs, *Keohane v. Jones*, 4:16-cv-511 (N.D. Fla.).
17. Shortly after the lawsuit was filed, within a matter of weeks, the FDC provided me with hormone therapy. However, I was still denied access to female clothing and grooming standards. I explained the impact of FDC's actions in a Declaration that I filed in my previous lawsuit. *Keohane v. Jones*, 4:16-cv-511 (N.D. Fla.), ECF No. 33-3 (filed Oct. 6, 2016).
18. In 2017, the FDC introduced a new policy concerning treatment for gender dysphoria. The policy, Procedure 403.012, recognized that both hormone therapy and other accommodations to facilitate transition can be medically necessary for gender dysphoria.
19. For over 6 years, until December 2024, I was able to follow female clothing and grooming standards. And my hormone therapy continued.

20. Dozens of other transgender women that I know at Wakulla CI were also provided hormone therapy and access to female clothing and grooming standards under FDC's policy since 2018.
21. Being able to receive hormone therapy and follow female clothing and grooming standards made it possible for me to live as the woman I am and, thus, alleviated the painful distress of gender dysphoria.
22. When I have been forced to abide by male standards in the past, my health has significantly worsened. The ability to socially transition enables me to function. When forced to present as a male, I experience huge spikes in my gender dysphoria and mental and physical distress. The ability to wear my hair long and wear women's underwear and bras is instrumental in alleviating the symptoms of my gender dysphoria. Additionally, when having to wear boxers, as opposed to female underwear, the movement of my genitals is a constant reminder of the parts of my body that do not align with my gender identity and causes great distress.
23. I had thought that the denial of treatment for gender dysphoria was behind me, but that changed on Monday, September 30, 2024. On that day, all transgender inmates in Wakulla CI were informed that treatment for gender dysphoria would be changing.

24. To inform us of this change in policy, the transgender inmates—roughly 80 of us—were rounded up in the visitation park. There, an individual from Centurion Health (the FDC-contracted medical provider) stated that our treatment for gender dysphoria would be changing, “up to and including hormone therapy.” Then, Colonel Paynter seemed to read portions of a document that we were then told to sign. He explained that restrictions on clothing and grooming accommodations would begin being enforced in 30 days, at which point they would order all transgender inmates to shave our heads, would confiscate all female clothing and canteen items, and would issue boxers as a replacement for our undergarments. If we did not comply, he said that we would be subject to “disciplinary action.”

25. On October 4, 2024, the same group of about 80 of us were summoned and ordered to visit Dr. Cortes, Wakulla CI’s primary medical practitioner, for Tanner Stage evaluations—measuring the size of our breasts—to determine if we would “qualify” for a bra for physical support based on Monday’s announcement. I have not been informed if I will qualify and therefore, I have not been provided a renewed medical pass for a bra, despite having previously received such bra passes.

26. While at Medical for the breast exam, I was informed by a staff member that the medical staff were ordered to follow “Health Services Bulletin 15.05.23”

(“Health Bulletin”). Some Wakulla medical staff stated that they are worried that they will be committing medical malpractice by following and enforcing the Health Bulletin but that they would risk termination of their employment if they voiced their concerns and/or did not abide by the Health Bulletin and corresponding orders.

27. FDC confiscated my underwear and bras, my cosmetics like mascara, foundation, and lipstick as well as a hairbrush, and even my makeup bag was taken from me. These were items that my family and I had purchased with our own money. It was particularly humiliating to be searched specifically to confiscate my underwear.

28. In order to comply with the new policy, I cut my own hair which was shoulder-length at the time. Despite cutting my hair short, Assistant Warden Rummel told me that my hair was not “in compliance.” He and Captain Chun escorted me to the barber shop and instructed the inmate barber to cut it evenly all over, off the ears and collar. While my hair was being cut, I struggled to hold back tears. I did not want to cry in front of other people, but this was a traumatic experience. It hurt me so much to have my hair cut, which felt so invalidating and a violation of my body. After my hair was cut, they took pictures of me.

29. The enforcement of the new policy regarding clothing and grooming accommodations is not allowing me to be myself; I am being forced to present as someone else. I am not a man, and I never have been. It worsens my gender dysphoria. I avoid seeing my reflection because it doesn't look like me; I feel like I'm looking at an imposter. I also isolate myself and avoid going to the mess hall because I don't want to interact with others or be in the world like this. My anxiety has seriously increased. I am a woman and not being able to present myself as such has severe effects to my mental health. I am in a fragile state, and I feel uncomfortable all the time. Sometimes I would prefer it if I did not exist, given all of this.

30. On October 31, 2024, I was evaluated for gender dysphoria by a prison psychologist, Dr. Joshi. I had previously been diagnosed with gender dysphoria by FDC healthcare personnel, and my understanding is that this was a re-evaluation required by HSB 15.05.23. Dr. Joshi reconfirmed my diagnosis of gender dysphoria. To the best of my knowledge, Dr. Joshi recommended that my hormone therapy should not be discontinued and she sent her report regarding my diagnosis and proper treatment to FDC's central office in Tallahassee.

31. To date, I have not received any information about whether FDC will grant me a "variance" and allow me to keep receiving hormone therapy.

32. I have already endured the horrifying effects of being denied hormone therapy. After being on hormone therapy for more than six years, and seeing the relief it provided from the pain of gender dysphoria, the prospect of losing that care is terrifying.
33. I cannot survive without hormone therapy and the ability to live consistent with my female gender identity, and I am living in constant fear that my hormone therapy might be taken away.
34. I believe I can serve as a class representative in this case and represent the interests of others. I care about making sure that other trans people in the FDC system who, like me, have been harmed by the change in FDC's policies are not denied necessary medical treatment and are able to get gender-affirming care. I believe I can represent others because I take seriously the duty to represent them and I share the experiences and pain and suffering that those who have been impacted by the FDC's change in policy are experiencing.
35. I have worked cooperatively and fully with my attorneys to respond to requests for information and will continue to do so in the future on behalf of myself and others. This includes a commitment to review information and court documents that are sent to me, respond to my attorneys when they seek information about me or issues in this case, and offer my attorneys any other input or assistance to the best of my ability.

36. I hope this lawsuit can bring a positive change such that FDC is no longer causing harm to me or others with gender dysphoria, and that no one else has to experience what I am going through.

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

Dated: April 9, 2025

/s/ Reiyn Keohane
Reiyn Keohane