

EXHIBIT D

**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 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 in support of Plaintiffs' Motion for Class Certification:

1. I am a 59-year-old transgender woman serving a sentence in the custody of the Florida Department of Corrections ("FDC") since 1985. I am currently incarcerated at the Wakulla Correctional Institution ("Wakulla CI"), specifically in the Wakulla Annex, located in Crawfordville, Florida. My DC number is 099172.
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 changes FDC has made to its policies for the treatment of individuals with gender dysphoria, including the fear of the discontinuation of my medically necessary hormone therapy and the confiscation of my female clothing and items including tweezers, shampoo, conditioner, hair elastics, and cosmetics and makeup which allow for me to express my female identity.
5. These changes have caused my mental health to dramatically deteriorate, including increased feelings of anxiety, depression, loss of appetite, and

trouble sleeping, and worsening thoughts of suicide. I live with the constant fear, day to day, of not knowing what is going to happen to me and whether I will continue to receive my hormone therapy treatment.

6. Since age 15, I knew that my gender identity was female, and it did not align with my male-assigned sex at birth.
7. In 1993, I presented as female and began socially transitioning and going by the name “Sasha”.
8. In July 2020, after being evaluated by FDC healthcare personnel, I was diagnosed with gender dysphoria. FDC subsequently approved me for female clothing and grooming accommodations. I began wearing female underwear and cosmetics and grew out my hair.
9. On July 21, 2021, FDC healthcare personnel recommended hormone therapy treatment to alleviate my gender dysphoria.
10. Under the recommendation and care of FDC healthcare personnel, I began hormone therapy in 2022.
11. The clothing and accommodations allowing me to have female items including shampoo, conditioner, hair elastics, and cosmetics and makeup, and the hormone treatment I received alleviated the distress of my gender dysphoria. And because I felt more like myself and was more comfortable in

my body, my depression and anxiety significantly decreased, my appetite increased, and my insomnia decreased.

12. On September 30, 2024, while in custody at Lake Correctional Institution, all transgender inmates were told that there was an FDC policy change regarding treatment of gender dysphoria, which could affect our ability to continue hormone therapy and rescinded passes for female clothing and other accommodations including my tweezers, shampoo, conditioner, hair elastics, and cosmetics and makeup. We were further told that if we did not comply with male clothing, hair, and appearance standards, we would face disciplinary action.
13. On September 30, 2024, I was examined by Dr. Mesa and received a medical pass for a bra for breast support, valid for one year. I am otherwise required to follow male clothing, hair, and appearance standards.
14. Due to institutional transfers, my female clothing and the other female items I had were gradually confiscated. Beginning in November 2024 through January 2025, my female undergarments such as panties, and my tweezers, shampoo, conditioner, hair elastics, and cosmetics or makeup were taken.
15. I have not yet been reevaluated under HSB 15.05.23 to determine if I will be approved for a “variance” to allow me to continue receiving hormone therapy.

16. As a result of the change in policy, I am prohibited from dressing and appearing consistent with my female gender identity. The change in policy has me living in fear of being withdrawn from hormone therapy. As a result of these changes, my mental and physical health has dramatically deteriorated, including that I feel increased anxiety, depression, low self-esteem, loss of appetite, and having trouble sleeping. Also, as a result, my thoughts of suicide have worsened.

17. I cannot survive without hormone therapy and the ability to live consistent with my female gender identity.

18. I believe I am capable of representing the interests of others in the case as a class representative because I have decades of understanding of this harm in a correctional facility setting. I was incarcerated at 18 years old and spent years hiding who I was because of society and the circumstances of being in correctional facilities. Because I have a life-sentence, I am in a unique position and I will continue to fight for myself and others to receive the medically necessary care we need for our gender dysphoria, especially in FDC custody, where it is essential for survival. I care about getting healthcare for other transgender inmates in the FDC system who, like me, have been harmed by the change in FDC's policies. I believe I can represent others because I know exactly what they're feeling, what they're going through, and I can feel the

pain, the hurt, and what is missing when either their hormone therapy or their female clothing and canteen items are taken away.

19. 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.

20. I hope this lawsuit can bring a change such that FDC is no longer causing harm to me or others, so that no one else has to experience what I am going through. This is not only about me, this is about all of us in here.

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

Dated: April 2, 2025

/s/ Sasha Mendoza
Sasha Mendoza

/s/ George Mendoza
George Mendoza