

EXHIBIT E

**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 SHEILA EMERALD DIAMOND

My name is Sheila Emerald Diamond; my legal name is Kelvin Coleman. 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 49-year-old transgender woman serving a sentence in the custody of the Florida Department of Corrections ("FDC") since 2017. 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 971855.
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, including the fear that despite being approved for hormone therapy, now it will never be provided, being forced to cut my hair out of fear that I would be forcibly shaven, having to maintain short hair, and the confiscation of my female clothing and cosmetics, makeup, and hair accessories items which allow for me to express my female identity. Being forced to dress like a man is unbearable. The only thing I'm living for is the hope of being able to transition.

5. These changes have had detrimental effects to my mental health, including feeling extremely depressed, anxious, and having thoughts of suicide. If I can't get the help I need to transition, it feels like I want to end it all. Without my care, I'm being forced to be in a body that is not the woman I am.
6. Since I can remember, I have always known that I have a female gender identity and at age 7 I began using the name "Sheila."
7. Beginning as a child, I was often female-presenting, wearing clothing traditionally considered for women, applying makeup, and growing my red-curly hair long.
8. At age 11, I was removed from Howard Middle School, a public school located in Ocala, Florida, and placed in an alternative school because of my transgender identity.
9. By the time I was a teenager, when I moved away from my disapproving family, I dressed and groomed consistently with my female gender identity in my daily life.
10. I have been in FDC custody since 2017.
11. I requested an evaluation for gender dysphoria soon after entering the custody of FDC, however, I was only able to receive an evaluation several years later.
12. In 2022, Dr. Smith evaluated me and made a provisional diagnosis of gender dysphoria at Jackson Correctional Institution.

13. On January 23, 2024, after a year-long evaluation process, Dr. Joshi and Dr. Leacock, psychologists at FDC, confirmed my diagnosis of gender dysphoria and recommended I receive access to female-stereotypical clothing, canteen items, permission to grow my hair, and hormone therapy treatment.
14. I was informed that before I could receive my accommodations passes and hormone therapy, these recommendations by FDC healthcare personnel had to be approved by the Gender Dysphoria Review Team (“GDRT”) in Tallahassee.
15. I was told that the GDRT was “put on pause” and have received no further information nor the recommended clothing and grooming accommodations or hormone therapy.
16. Though I did not have a pass for clothing and grooming accommodations, I had long hair that I wore in braids and was wearing female undergarments and makeup that I had made or purchased from other inmates.
17. I knew this put me at risk of discipline but took the risk because of how it would impact my gender dysphoria to have to dress and groom as a man.
18. Not long after the Health Bulletin was announced on September 30, 2024, I cut my hair short to be in compliance out of fear of having my head forcibly shaved if I did not.

19. On October 30, 2024, FDC officials confiscated my bras, panties, makeup, and female hygiene products. About two weeks later, FDC confiscated all of my additional female clothing and alternate canteen items through an involuntary search of inmate property commonly referred to as a “shake down.”
20. Since cutting my hair and having my female underwear and cosmetics, makeup, and hair accessories items removed from me, I am suffering every day. My gender dysphoria has increased; I am experiencing severe depression, anxiety, self-esteem issues, and suicidal thoughts.
21. I cannot survive without the ability to live consistent with my female gender identity.
22. I believe I can serve as a class representative in this case and represent the interests of others. 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. Not all of my sisters who are incarcerated can read or write or express themselves through the grievance processes or otherwise. I have been at institutions where I was the only woman who was openly transgender, and I have been going through and have been through a lot just to survive under these circumstances without getting the help I need. No matter what happens, my concern is not just for myself it is for each and every one of us

because we deserve to live and not die, we deserve to fight back legally when we are attacked. I believe I can represent them because I understand the pain and suffering that they are experiencing.

23. 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.

24. I want this lawsuit to force FDC to respect us and give us the help we need to transition, to let us grow our hair, wear our female clothes, and give us the hormone therapy we need to properly transition so our bodies will look like they are supposed to look and feel like they are supposed to feel. I hope this lawsuit makes FDC cease the harm happening to myself and others and to ensure no one else has to experience what I'm going through.

I, Sheila Diamond, 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/ Sheila Emerald Diamond
Sheila Emerald Diamond

/s/ Kelvin Coleman

Kelvin Coleman