

# EXHIBIT F

**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 KARTER JACKSON**

My name is Karter Jackson. My legal name is Candace Jackson. 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 36-year-old transgender man serving a sentence in the custody of the Florida Department of Corrections ("FDC") since 2014. I am currently incarcerated at the Florida Women's Reception Center ("FWRC"), located in Ocala, Florida. My DC number is V29455.
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 loss of effective hormone therapy and a fear that FDC will entirely discontinue all of the hormone therapy I receive. I also have been harmed by the confiscation of my male clothing and alternate canteen items, including boxers and male deodorant that allow me to express my male identity.
5. These changes are deteriorating my physical and mental health, including that new policy is forcing me through circumstances that are a detransition from my male identity. I am experiencing depression, extreme emotions, increased

gender dysphoria, and decreased self-esteem. I experienced suicidal ideation before beginning my treatment for gender dysphoria and I fear such thoughts will soon return.

6. I knew since I was about 9 years old that I had a male gender identity.
7. I entered the custody of FDC in 2014.
8. In 2022, I began seeing FDC healthcare personnel for help with the distress I was feeling related to my gender.
9. In December 2022, I was diagnosed with gender dysphoria and approved for hormone therapy treatment and access to male clothing and alternate canteen items by FDC healthcare personnel. In January 2023, I began receiving testosterone injections as recommended by FDC healthcare personnel. A few months later I received my passes for clothing and grooming accommodations.
10. On or about October 2023, FDC stopped providing hormone therapy by way of injections, replacing them with testosterone gel. Once I began the gel, my testosterone levels significantly dropped, so much so I began menstruating again, and an FDC nurse told me multiple times that the level can no longer be classified as a male's level. For my health, I have continuously requested to receive injections again, however FDC refuses to provide them.

11. On September 30, 2024, all the transgender individuals at FWRC, where I was housed at the time, were rounded up, read a copy of the Health Bulletin, and told that we had 30 days to send all of our male clothing and alternate canteen items home or face disciplinary action.
12. On or around October 10, 2024, FDC confiscated my male clothing and alternate canteen items, including boxers and male deodorant.
13. On or around December 2024, all of the transgender individuals at FWRC were called to mental health for what was referred to as a “reevaluation,” where we, as a group, met a few mental health counselors and members of the FDC medical staff. There, we were given an option to “sign-out” of the program, meaning if we signed the provided paper, we were agreeing to no longer receive testosterone gel or any treatment for gender dysphoria. I did not sign out. The only question we were asked was if we wanted to “sign out or stay,” with no further context. They did not ask me any medical questions, and the meeting lasted only a few minutes.
14. I have received no information indicating if I have been approved for a “variance” to be able to continue receiving the testosterone gel.
15. Given the Health Bulletin, I do not know if I will be able to continue receiving any hormone therapy.

16. Because my male clothing and alternate canteen items have been taken away and I am no longer receiving effective hormone therapy - and do not know if I will be able to continue receiving even the gel testosterone going forward - I am experiencing depression, extreme emotions, increased gender dysphoria, and decreased self-esteem. I feel that the new policy is forcing me to detransition. I experienced suicidal ideation before beginning my treatment for gender dysphoria and I fear such thoughts will soon return.
17. I cannot survive without hormone therapy and the ability to live consistent with my male gender identity.
18. I believe I am capable of representing the interests of others in the case as a class representative. I know how it feels to have our care being taken away, and the mental and physical effects are something we are all going through. We are transitioning and we are trying so hard to be the people that we are, but there are so many people who try to make us feel like we are not good enough and FDC taking away our care and belongings feels like they are destroying us and denying us who we are. 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 them because I understand the pain and suffering that they are experiencing.

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 brings back our accommodations, that FDC will continue our hormone therapy to help us transition, and I want them to do better—to treat us with respect and dignity, and with healthcare professionals that know how to treat transgender people. I want the harms to stop, and for FDC to stop robbing us of our transition.

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

Dated: April 3, 2025

/s/ Karter Jackson  
**Karter Jackson**

/s/ Candace Jackson  
**Candace Jackson**