

EXHIBIT G

**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 NELSON BOOTHE

My name is Nelson Boothe. My legal name is Natasha Boothe. 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 27-year-old transgender man serving a sentence in the custody of the Florida Department of Corrections ("FDC") since September 18, 2024. I am currently incarcerated at the Florida Women's Reception Center ("FWRC"), located in Ocala, Florida. My DC number is A62460.
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 hormone therapy for approximately six months. I 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 grooming items, including male deodorant, soap, and body wash. These items allow me to express my male identity and are necessary for me to maintain hygiene, because the female products do not work for my body due to physical changes from my transition. I have also experienced mental distress because FDC no

longer consistently honors the accommodation pass I was previously issued that allowed me to shower separately from female inmates.

5. These changes are impacting my physical and mental health, including that the new policy prevents me from expressing my male identity. As a result, I am experiencing weight loss, insomnia, depression, anxiety, self-isolation, and suicidal ideation. These symptoms, along with the way that FDC staff have changed how or if they honor my male identity is taking a toll on my mental and physical health.
6. I have known that I am male since I was around 8 years old.
7. I began socially transitioning and going by the name “Nelson” since 2014, when I was 17 years old.
8. After extensive evaluation, I was diagnosed with gender dysphoria in 2015 by healthcare professionals and was recommended to begin hormone therapy. I began taking injections of testosterone as recommended shortly thereafter.
9. I entered custody of FDC on September 18, 2024. I am currently housed at the Florida Women’s Reception Center.
10. I asked to continue my hormone therapy upon entering FDC custody. However, only after grieving the lack of care was I able to receive testosterone gel about a month and a half later.

11. I did not receive any hormone treatment for 6-weeks. The sudden lack of treatment after receiving hormone treatment for nearly a decade resulted in me becoming ill, including experiencing withdrawal symptoms like extreme fatigue, muscle spasms, loss of appetite, severe anxiety, weight loss, and nausea. In addition, my menstrual cycle began again after having been suppressed by testosterone for many years and caused intense gender dysphoria.
12. Even though I am now again receiving testosterone gel, I do not believe that it is as effective as the injections that I had been receiving for years prior to entering FDC custody. For example, it has not consistently suppressed my menstruation and, thus, does not prevent the dysphoria and intense stress that accompanies having a menstrual cycle.
13. My boxers and male hygiene items such as male deodorant, soap, and body wash were confiscated upon entry into custody and I have not been provided with any male clothing, grooming, or alternate canteen item accommodations passes.
14. FDC initially provided me a shower accommodation pass to allow me to shower separately from the women in the facility but revoked the pass a few weeks later. I was told the pass was revoked because it was an accommodation provided with the program created for transgender inmates, but the program

no longer exists—it was terminated on or around November 2024 because of the Health Services Bulletin. Now, there is not a consistent approach to when I may or may not be required to shower with the female inmates. The experience of showering with the female inmates, as well as the inconsistency, causes me a great deal of stress.

15. On February 21, 2025, I was called to the mental health office to be reevaluated for gender dysphoria. The mental health counselor who evaluated me confirmed my gender dysphoria diagnosis. Even though my diagnosis was confirmed, I have not received any information indicating if I was approved for a “variance” to be able to continue receiving hormone therapy.
16. The lack of clothing and grooming accommodations, coupled with receiving insufficient testosterone, has caused me to experience ongoing and severe adverse physical and mental health consequences including weight loss, insomnia, depression, anxiety, self-isolation, and suicidal ideation.
17. I am also living in fear that even my testosterone gel treatment will be taken away given the Health Services Bulletin. I am already suffering from the switch from testosterone injections to the less effective gel and if I were to be denied any testosterone altogether, I don’t believe I would be able to survive.
18. I believe I am capable of representing the interests of others in the case as a class representative. 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. 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. I am committed to fulfilling the role of class representative and taking all the steps necessary to stand together and obtain the medical care we need and deserve.

19. I hope this lawsuit can bring a change that ensures that FDC is no longer causing harm to my mental and physical health or to the health of others, and that it also results in a policy change that encourages FDC staff to maintain a community of respect within the FDC facility. I do not want anyone else to experience what I am going through.

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

Dated: April 7, 2025

/s/ Nelson Boothe
Nelson Boothe

/s/ Natasha Boothe
Natasha Boothe