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6 UNITED STATES DISTRICT COURT  
7 EASTERN DISTRICT OF WASHINGTON AT RICHLAND

8 JOHN DOE 1; JOHN DOE 2; JANE  
9 DOE 1; JANE DOE 2; JANE DOE 3;  
10 and all persons similarly situated,

11 Plaintiffs,

12 v.

13 WASHINGTON STATE  
14 DEPARTMENT OF CORRECTIONS;  
15 STEPHEN SINCLAIR, Secretary of The  
16 Department of Corrections, in his official  
17 capacity,

18 Defendants,

19 and

20 BONNEVILLE INTERNATIONAL,  
21 INC. a Utah Corporation, d.b.a KIRO  
22 Radio 97.3 FM; THE MCCLATCHY  
23 COMPANY, LLC, a California Limited  
Liability Company, d.b.a. The Tacoma  
News Tribune; and ANDREA KELLY,  
an individual,

Interested Parties.

No. 4:21-cv-05059-TOR

DECLARATION OF JANE DOE 1

I, [REDACTED], declare and state as follows:

1           1.     I am over the age of 18 and competent to make this declaration. I live  
2 in Pierce County, Washington.

3           2.     I am a woman who lives in the Washington Corrections Center for  
4 Women (WCCW). I was assigned the male sex at birth. I transitioned  
5 approximately nine years ago. I have had gender affirming surgery and am  
6 registered as a female on most of my government documents. I also have changed  
7 my legal name to [REDACTED], a more feminine name than the male name I was  
8 assigned at birth. In the community many people did not know that I am  
9 transgender, unless I told them. This allowed me control over my personal history  
10 and my story. When I was arrested, I was housed with other women in the county  
11 jail. From there I was transferred to WCCW.

12           3.     When I came to prison I had the fear that I would be a target. I knew  
13 that if other people in custody or officers were to know that I am transgender that I  
14 would be targeted for assault, harassment, false allegations, and other problems.  
15 People not knowing that I am transgender keeps me safe. When people see me they  
16 do not think that I am transgender, they look at me and think that I am a cisgender  
17 woman. If people were to know for sure because my information were released by  
18 the Department of Corrections (DOC), I would be a much bigger target.

19           4.     I am very concerned about all of my information getting out. One  
20 piece of information I am particularly concerned about is whether I have had  
21 surgery. I want it to be that I am just a female. A lot of the times when people find  
22 out a person is transgender, they might ask if they've had surgery, and what  
23 surgeries they have had. This is extremely harmful and invasive. It is literally

1 asking to see my private parts, to know what my private parts look like. This is  
2 extremely private information about my body and there is no reason why it should  
3 be disclosed to anyone.

4 5. My earned release date is in a few years. I'm afraid that if DOC  
5 releases the information that they have about me I will have a hard time finding  
6 housing and a job in the community. One of the requirements for me to release is  
7 that I have to have a release address, or housing, approved by DOC. If there is a  
8 disclosure of my private information, I will have a harder time finding an address  
9 and I may serve additional prison time. I could also be subject to discrimination  
10 and have a harder time finding a job. Having all this information about me out  
11 there would put me at risk of violating my community custody and being sent back  
12 to prison. I also know that a lot of people do not like transgender people. They  
13 think we are perverse and bizarre, and they are afraid of us. They don't want to live  
14 with us, they don't want to work with us, and they want to hurt us. I honestly fear  
15 for my safety and for my life when I leave prison. I am afraid that I could get shot  
16 or hurt, or be victimized or sexually assaulted. I don't know why the government  
17 would release this information.

18 6. I have been diagnosed with depression, and like many people, in the  
19 past I have attempted suicide. I have done a lot of work to live in a way that is  
20 comfortable for me. If this information is disclosed, I would be at risk of harming  
21 myself again. I would like to believe that I am not there anymore and that I am  
22 strong enough to survive being outed by DOC. But at the end of the day it scares  
23

1 me that if my information were put out there by DOC, that could send me right  
2 back to that time of self-harm.

3 7. The purpose of this lawsuit is to save me from the embarrassment and  
4 harm that will result if my personal information is disclosed. As discussed here, I  
5 have significant concerns about my privacy and safety if my identity and  
6 information were released to the public. I am concerned that my name being used  
7 in connection with this lawsuit will have the actual result of disclosing the personal  
8 information that I am seeking to keep private. I also have concerns that DOC and  
9 its staff, the requestors, and the public would subject me to retaliation or ridicule if  
10 my name were used in this action. For these reasons, and those stated above, I  
11 desire to proceed anonymously.

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I declare under penalty of perjury under the laws of the United States of America the foregoing statements are true and correct.

Dated this 5 day of April 2021 at [REDACTED] [REDACTED] Washington.

[REDACTED]

[REDACTED]