

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ISIS BENJAMIN; FANTASIA HORTON;
NAEOMI MADISON; BRYNN WILSON;
and JOHN DOE; on behalf of themselves
and all persons similarly situated,

Plaintiffs,

v.

COMMISSIONER TYRONE
OLIVER, in his official capacity;
ASSISTANT COMMISSIONER
RANDY SAULS, in his official capacity;
STATEWIDE MEDICAL DIRECTOR
DR. MARLAH MARDIS, in her official
capacity; and CENTURION OF
GEORGIA, LLC,

Defendants.

Case No. 1:25-cv-04470-VMC

DECLARATION OF GERALD E. WYNNE

I, Gerald E. Wynne, D.O., declare that this declaration is made of my own personal knowledge, that I am competent to testify as to the matters stated herein, and that the following statements are all true and correct:

1. I am the Statewide Medical Director for Centurion of Georgia, LLC (“Centurion”), which is the healthcare contractor for the Georgia Department of Corrections (“GDC”).
2. In my capacity as Statewide Medical Director, I am familiar with the care and treatment provided to individuals in GDC’s custody who have been diagnosed with gender dysphoria.
3. Currently, there are approximately 340 persons in GDC’s custody who have been diagnosed with gender dysphoria. Of those, 107 patients were receiving hormone replacement

therapy, sometimes referred to as “HRT,” as of June 30, 2025.

4. In early July 2025, as requested by GDC to comply with Senate Bill 185, Centurion began tapering all patients off HRT. As of August 14, 2025, the tapering process stands as follows: 17 inmates have completed the tapering process; 3 were released from custody; and 88 are currently in the tapering process. This total is 108, instead of the 107 I mentioned above, because the group includes an inmate who was receiving HRT when that person entered GDC custody after the tapering process had begun. That person is now in the tapering process.

5. I anticipate that the 88 patients currently undergoing tapering will complete the tapering process by September 30, 2025. Some may complete it as early as August 30, 2025. The variance in completion dates is based on a patient’s specific circumstances, including the treatment dosage when tapering began. A patient on a lower dose of hormone medication will complete the process sooner than a patient receiving a higher dose.

6. All patients undergoing tapering are monitored by mental health and medical professionals. For medical monitoring, each patient has a meeting with the statewide medical director every four weeks. Patients may submit a request for additional medical care or evaluation if they have acute concerns during the tapering process. In addition, all patients received an initial evaluation by mental health staff prior to tapering. Based on that evaluation, mental health professionals determined how frequently follow-up evaluations should be scheduled based on patient-specific needs. All patients receive follow-up evaluations at least once every four weeks, with some receiving evaluations more frequently.

7. I am familiar with the patients who are identified as plaintiffs in this lawsuit. The following information is based on my personal knowledge of those patients and a review of their medical records.

8.

[REDACTED]

9.

[REDACTED]

10.

[REDACTED]

11.


[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true.


Digitally signed by Dr.
Gerald E. Wynne DO
Date: 2025.08.18
16:29:41 -04'00'

Gerald E. Wynne, D.O.

8/18/25

Date