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**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.

Civ. Case No. _____

CLASS ACTION

DECLARATION OF FANTASIA HORTON

My name is Fantasia Horton.¹ 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:

1. I am a 37-year-old transgender woman in the custody of the Georgia Department of Corrections (“GDC”).

2. I have personal knowledge of the facts set forth herein, and could and would testify competently to these facts if called as a witness.

3. I was assigned male at birth, but I am a transgender woman.

4. I am currently incarcerated at Phillips State Prison in Gwinnett County, Georgia. I have been incarcerated in GDC custody since 2011 and am serving a life sentence with parole.

5. I realized I was different when I was child—around the age of 12—and have known that I am a woman since about the age of 19. Because I was in the military when I discovered my transness, I decided to wait until I was out of the military to transition because of Don’t Ask Don’t Tell. However, word still got out that I was trans, so I experienced terrible hazing and abuse from other service members that left me with PTSD.

¹ My legal name is [REDACTED]. My Georgia Department of Corrections number is 1000536220.

6. Before I was diagnosed with gender dysphoria, I suffered from depression, anxiety, disassociation episodes, panic attacks, and suicidal ideation. I also engaged in self-harm by cutting.

7. I was diagnosed with gender dysphoria in 2019, while incarcerated in GDC. After I was diagnosed with gender dysphoria by a GDC psychologist, Dr. Weaver, I met with a doctor and then an endocrinologist, Dr. Malloy. The GDC endocrinologist determined that hormone therapy is a medically necessary treatment for my gender dysphoria and prescribed me treatment in 2019.

8. Since 2019 when I was first prescribed hormone therapy, I have taken it consistently apart from one week that GDC ran out of medication. My hormone therapy is a biweekly estradiol injection in the amount of 15 ml, as well as spironolactone pills.

9. Since starting hormone therapy, I have felt much better. Eight months after I started hormone therapy, I was able to stop taking my mental health medication for depression and anxiety.

10. Even though hormone therapy is vital treatment for my gender dysphoria, it is not the only treatment I require. I have requested other gender-affirming accommodations through GDC as well. Last year, I also requested gender confirmation surgery because I was still having gender dysphoria symptoms, but I

was told that surgery has never been done in a Georgia prison and that my request would have to wait until after the 2024 election.

11. After the election, GDC officials told me that I will not be allowed to receive gender confirmation surgery. But because surgical treatment for my gender dysphoria is so important to my health and well-being, I requested a surgery evaluation again in July 2025.

12. However, in July 2025, I learned that GDC will be cutting me off from gender dysphoria treatment entirely because of a new law called SB185. Because of SB185, I will not be able to receive hormone therapy in GDC going forward or get evaluated for the surgery that I desperately need.

13. On Tuesday, July 8, 2025, right after I received my biweekly hormone therapy shot, I was called in to a meeting with a GDC psychologist who I had never met before. The psychologist told me that because of SB185, I would no longer be able to receive hormone therapy, surgery, or any other gender dysphoria treatment from GDC. She also told me that instead of continuing hormone therapy, I would begin being detransitioned by GDC.

14. I explained to the GDC psychologist how important hormone therapy is for my mental health, including my anxiety and depression. But the GDC psychologist told me there was nothing she could do because of SB185 and GDC's new policy. I was not offered any other treatment.

15. On July 8, 2025, Warden Pinero, the Warden of Phillips State Prison, asked me whether I had spoken to mental health yet about the new policy, confirming that he knew about the detransition plan. I told him yes.

16. In mid-July, I was also told that I would no longer have access to gender dysphoria treatment because of SB185 in a video conference with the Centurion Medical Director, Dr. Wynne. Dr. Wynne told me that because of SB185, I could no longer receive hormone therapy, be evaluated for gender confirmation surgery, or receive any other gender dysphoria treatment. Dr. Wynne told me that I could either stop my hormone therapy “cold turkey” or be “detransitioned” over several weeks by receiving half doses of my medication.

17. I objected to both proposals because I knew that they both would harm me. I asked Dr. Wynne if I could continue receiving hormone therapy because of the ways that treatment had improved a lot of my mental health symptoms. I told Dr. Wynne that I had a history of suicide ideation and suicide attempts when I had been denied gender dysphoria treatment in the past. I also explained that without treatment, my mental health would decline again. However, Dr. Wynne wouldn't listen or help me. He just kept referring to SB185.

18. I asked Dr. Wynne if I could receive surgical castration to remove my testicles because I knew that I would be harmed by having testosterone return to my body. Specifically, I knew that testosterone would make me lose feminine features

like my breasts, and would masculinize my body in ways that put my mental health at risk. I also knew that being cut off from feminizing hormones and being exposed to testosterone would have damaging physical health effects. Dr. Wynne told me no, that surgical treatment was not possible because of SB 185.

19. Out of desperation, I asked Dr. Wynne if I could continue receiving hormone therapy or surgery if my family was able to pay. He told me no, that due to SB185, my family could not pay for my hormone therapy or surgery. I also asked if there were any alternative gender dysphoria treatments or healthcare that would be available to me, and he said no.

20. Dr. Wynne also informed me that my denial of gender dysphoria treatment was a non-grievable issue because SB185 was signed by the Governor, so it concerned matters “outside of the prison.”

21. On July 28, 2025, I went to receive my biweekly hormone therapy dose from prison medical staff, understanding it would be a half dose based on my conversation with the Centurion Medical Director. But I was told by the nurse that I no longer have access to *any* hormone therapy medication because of SB185. As a result, I was denied my hormone therapy at my regular appointment at time.

22. On August 5, 2025, I had another appointment with GDC medical staff, and this time I did receive a dose of hormone therapy—the therapy that I had been denied a week before. The nurse told me that I would continue receiving partial doses

for the next weeks, but my care would be completely terminated by the end of the month of August.

23. Being cut off from medically necessary healthcare as a result of SB185 has been physically and emotionally devastating. After going without hormone therapy for just one week—July 28 to August 5—I felt depressed and drained. My suicidal thoughts returned, and I felt hopeless about the future.

24. Seeing how bad I felt after just one week without hormone therapy really left me frightened. It reminded me of the horrible period before I began gender dysphoria treatment in GDC where I was really on edge.

25. Before I began receiving treatment from GDC, I was battling anxiety and depression because of my gender dysphoria. My gender dysphoria also made me feel suicidal, so I engaged in self-harm and attempted to end my life. And approximately three years ago when my prison ran out of hormone therapy temporarily, my mental health suffered greatly. My depressive symptoms returned, even though I was only cut off from hormone therapy for about one week.

26. Given my history of depression, suicidality, and suicide attempts, if I am forced to go permanently without gender treatment, my life will be in danger. I fear I won't survive.

27. I know that I'm not the only person being affected by SB185, so I fear for everyone like me in GDC who is being forced to go without care. Another

transgender woman at Phillips State Prison was recently denied her hormone therapy because of SB185, and since then she's been really depressed and struggling a lot. I also know so many other transgender women who were supposed to be getting on hormone therapy, and now they won't be able to get treatment either.

28. The longer that SB185 law is enforced, the more harm it will cause to people inside. I know that if we are forced to go without gender dysphoria treatment for much longer, transgender people in GDC will hurt themselves, and people will die. But because GDC considers matters established by state law, such as SB185, to be non-grievable, we do not have access to any administrative remedies.

29. I am willing to serve as a class representative in this lawsuit, on behalf of myself and people whose facts and circumstances are similar to mine. I understand that the goal of the lawsuit will be to stop Defendants from continuing to enforce the provisions of SB185, not to recover monetary compensation. I do not have any interests that conflict with other class members and agree to fairly and adequately represent them.

30. I have retained the Center for Constitutional Rights and Bondurant Mixson & Elmore LLP as my attorneys and class counsel and have confidence in their ability to prosecute this case effectively.

31. I understand that as a class representative, I have a responsibility to participate actively in the litigation, to stay in regular contact with my attorneys, and

to ensure that my attorneys prosecute this case vigorously and in the interest of all class members. I agree to fulfill these responsibilities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 7, 2025.

/s/ Fantasia Horton
Fantasia Horton

I, A. Chinyere Ezie, certify that I have read the foregoing to Fantasia Horton, and that she affirmed that the foregoing is true and correct on August 7, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 7, 2025

/s/ A. Chinyere Ezie