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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 BRYNN WILSON**

My name is Brynn Wilson. 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 32-year-old transgender man in the custody of the Georgia Department of Corrections (“GDC”). My GDC ID is: 1000859126.

2. I am currently incarcerated at Pulaski State Prison in Hawkinsville, Georgia. I have been incarcerated since 2012.

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

4. I was assigned female at birth, but I am a transgender man.

5. I knew since I was a young person that I was a boy. I knew this since I was about 12 or 13 years old. My grandmother was supportive of me and how I saw myself, but she encouraged me to wait until I was older to make any changes to myself and my body.

6. When I had to live as a woman I felt trapped in the wrong body. This impacted me and my mental health and I often experienced feelings of depression, anxiety, and I would have panic attacks.

7. I eventually learned I felt this way because these are symptoms of gender dysphoria.

8. I was diagnosed with gender dysphoria at Lee Arrendale State Prison by a GDC doctor more than seven years ago.

9. After being diagnosed by GDC, I began receiving hormone therapy. I receive a testosterone injection of 0.6mL every two weeks.

10. I have been continuously receiving testosterone injections for approximately seven years.

11. The testosterone greatly improved my gender dysphoria symptoms, particularly my mental health. My anxiety and depression improved, and I stopped having panic attacks.

12. In late May, 2025, I learned about SB185 and its potential impact on my healthcare. It is my understanding that, because of this new law, I may soon be cut off from my medical treatment.

13. In early July 2025, I had a video call with a doctor from GDC who told me that GDC would stop giving me testosterone. The doctor gave me two options: quit the testosterone shots cold turkey or be weaned off testosterone. I chose the second option. The doctor told me I might have mood swings, agitation, or suicidal thoughts as I came off testosterone.

14. I was not given my testosterone shot the week of July 21st because I was not given a pass to go. Without the shot, I have felt irritated and had trouble sleeping and concentrating. I am supposed to get a shot the week of August 4th.

15. It is my understanding that GDC considers matters established by state law, such as SB185, to be non-grievable. Therefore, I do not have access to any administrative remedies.

16. I am fearful about losing my healthcare, and particularly its impact on my physical and mental health. If I no longer receive my hormone therapy I feel that

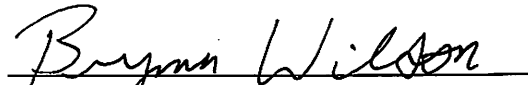
my menstrual cycle will begin again and my depression, anxiety, and panic attacks will return.

17. 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 interests that conflict with other class members, and I agree to fairly and adequately represent them.

18. I understand that as a class representative, I must participate in the litigation, and communicate with the plaintiffs' attorneys, and ensure that the attorneys prosecute this case vigorously and in the interest of all class members. I agree to fulfill these responsibilities.

19. 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.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection. Executed on July 2, 2025.

  
Brynn Wilson

I, Matthew R. Sellers, certify that I discussed paragraphs 15 and 16 in the foregoing with Brynn Wilson, and he affirmed that those paragraphs are true and correct on July 28, 2025. I declare under penalty of perjury that the foregoing statement is true and correct.

Dated: August 6, 2025      /s/ Matthew R. Sellers