

In The United States District Court  
For The Eastern District of Wisconsin

Dominique DeWayne Enrique HaKeem Gulley-Fernandez

Also known as, Jessica Ariana Giselle Wilds-Walker

Also known as, Teriyaki Ariana Wilds-Ward

Plaintiff,

Case No. 2015-CV-795

vs.

Dr. Tracy Johnson,

Dr. Shirley Dawson,

Dr. Dawn Landers,

Dr. Gary Ankarlo,

Dr. Kevin Kallas,

Capt. David Gardner,

Warden Gary Boughton

Frnr. Warden Timothy Haines, Frnr. Deputy Warden Troy Hermans

Christa K. Morrison,

Dr. Torria VanBuren, and Cynthia S. Osborne, MSW, and

Bureau of Health Services, Inc., et. al

Defendants

Comprehensive Amended Civil Rights Action Complaint

Filed Pursuant to 42 U.S.C. § 1983

Now Comes, the above named Plaintiff Dominique Gulley-Fernandez,  
aka Ms. Jessica Wilds-Walker, appearing in this matter pro se and

With the assistance of her fiance an Certified Paralegal, ~~at the~~ pursuant to Rule 15(a), Fed. R. Civ. P., Rule 15(a), and by this pleading will move and does so move the District Court for leave to read as follows as well as dismissing my Amended Civil Action Complaint filed on March 24, 2016 in this case, as it's redundant. And this herein Complaint read as follows:

## PARTIES

1. The parties of the lawsuit are to read in the foregoing manner ONLY nothing more and nothing else:

### Plaintiff

Jessica Wilds-Walker aka Dominique DeWayne Gulley-Fernandez, "(herein after "Jessica Wilds-Walker)" IS a State prisoner who is currently incarcerated at Wisconsin Secure Program Facility ("WSPF"), and has so been at all times I allege to have subjected to deliberate indifference of a serious mental health and medical need, ~~refused~~ the defendants refusal to treat me as a transgender with Gender Identity Dysphoria (GID), and suffers mental illness compounded with my Gender Dysphoria which causes me to self-harm or make threats of self-harm, causes me to act out self destructively, disobeying orders, disrespect, theft, forging documents etc and being repeatedly punished for acting out which my negative behavior is called by symptoms of my mental illness through conduct reports and retaliation by fabricating conduct reports - the defendants refusal to treat me as a woman and identify me as female etc. The defendants are in violation of my First Amendment Rights, Fourteenth

Amendment Rights, Thirteenth Amendment Rights and my Eighth Amendment Rights. (I will explain to the court how're they're in violation of my Constitutional rights). I seek those damages available to me, under the previously mentioned Statutes of the United States Constitution.

## II. JURISDICTION AND VENUE

2. This court has jurisdiction over the claims alleged herein under 28 U.S.C. § 1331.

3. Venue is appropriate in the Eastern District of Wisconsin under the venue provisions of 42 U.S.C. § 1983 in that the actions about which the plaintiff complains took place in the State of Wisconsin, and under § 1983, she may bring claims in Federal Court sitting in either the Eastern or Western District where her claims arose.

There's a conflict of interest with the U.S. Western District Court with the Court and defendants being well acquainted with one another due to the other cases filed by inmates at WSPF against the defendants with that district court... therefore I want this court to ~~hear~~ hear my case and handle ALL proceedings etc.

## III. PARTIES

4. The Plaintiff is an adult resident of the State of Wisconsin currently incarcerated at Wisconsin's #1 most restrictive Maximum prison at Wisconsin Secure Program Facility (formerly known as Supermax Correctional Institution) 1101 Morrison Drive, Boscobel, Wisconsin

5. The defendant, Gary A. Boughton, is employed by the State of Wisconsin Department of Corrections, headquartered in Madison, Wisconsin, and currently the Warden of the Wisconsin Secure Program Facility, Boscobel, Wisconsin. March 2014 - present.

6. The defendant, Timothy Haines, is employed by the State of Wisconsin Dept. of Corrections, and is the former Warden of WSPF and I believe he now works at Prairie Du Chen Correctional Inst. as Warden.

7. Defendants, Dr. Tracy Johnson, Dr. Shirley Dawson, Dawn Landers, Dr. Torria Van Buren, Gary Ankarlo and Kevin Kallas are all employed by the State of Wisconsin, Department of Corrections "Bureau of Health Services" and are Clinical Psychologists and mental health care providers for inmates at WSPF, GBCI, DCI, FLCI, RCI, PDCI and or CCI, and is operating under the color of State Law and authority in their official and personal capacities.

8. Defendant, David Gardner, is employed by the State of Wisconsin Department of Corrections, Wisconsin Secure Program Facility, as a Correctional Supervisor<sup>2</sup> and in his capacity as a Supervisor sits on the Program Review Committee, and parts of his duty is to ensure inmates rights are not violated or that inmates may not come ~~with~~ harm either by self-harm or by staff and or other inmates within the Dept. of Corrections, and as such, is operating under color of State Law and authority in his official as well personal capacity.

9. Christa K. Morrison is employed with the state of Wisconsin Department of Corrections, Bureau of Offender Classification and Movement, as offender Classification Specialist at the



Wisconsin Secure Program Facility, Boscobel, Wisconsin, and Prairie Du Chen Correctional Institution, Prairie Du Chen, Wisconsin, and is operating under color of State Law and Authority in her official as well personal capacity.

10. Cynthia S. Osborne, is employed by the State of Maryland and State of Wisconsin as a Gender Dysphoria Consultant on Contract with the State of Wisconsin Dept. of Corrections and Bureau of Health Services. Her address is; 2 Hamil Road, Baltimore, Maryland 21210

11. ~~Osborne~~ Troy Hermans, is employed by the State of Wisconsin Dept. of Corrections, as Superintendent/Deputy Director at the Oregon Correctional Institute, and is the Former Deputy Warden of Wisconsin Secure Program Facility, and is operating under color of State law and authority in his official and personal capacity.

12. Bureau of Health Services, Inc., is a health and mental health care provider under the State of Wisconsin, Dept. of Corrections with its Central office headquartered in Madison, Wisconsin and hires Clinical psychologists for the Department of Corrections to provide mental health care for those within the (DOC), designated as MH-I or MH-II and operates under color of State Law and authority in its official and personal capacities.

#### IV. FACTS

13. Jessica Ariana Giselle Wilds-Walker, was born male, however, has lived as a male to female transgender woman since she was 8 years-old. And prior to her incarceration within the State of Wisconsin lived and dressed as a female in the State of Louisiana

as well in the City of Milwaukee, Wisconsin.

14. In May of 2011, Plaintiff Wilds-Walker (aka) Dominique Gulley-Fernandez, agreed to have a psychological evaluation for diagnostic Clarification, to wit she was purposefully misdiagnosed and wrongfully diagnosed by Clinicians at Wisconsin Secure Program Facility.

15. Plaintiff Wilds-Walker (aka) Dominique DeWayne Gulley-Fernandez, herein after ("Jessica Ariana Giselle Wilds-Walker") or ("Wilds-Walker") has been hospitalized at various hospitals and Treatment centers since she was a small child, namely Rogers Memorial Hospital, St. Aemilians Residential Treatment Center, Charter Hospital, Child Adolescent Treatment Center, Milwaukee Co. Mental Health Institute, Carmelite, Ladd Lake, Mendota Mental Health Institution/mendota Juvenile Treatment Center, Serenity Residential Treatment Center/and Group Home, Haven House, and St. Charles Youth and Family Services Treatment center/ Shelter.

16. Plaintiff Jessica Ariana Giselle Wilds-Walker has been diagnosed in the past with Bipolar Manic Disorder, Mood Disorder, Anxiety, Obsessive Compulsive Disorder, Emotional Disorder, Attention Deficit Hyperactivity Disorder, Personality Disorder, Borderline Intellectual/ Personality Disorder and Posttraumatic Stress Disorder, but was NOT officially diagnosed with Gender Identity Disorder/ Gender Dysphoria. Thus, due to my serious mental health needs I should be placed under a MH-II designation, not MH-I.

17. Subsequently Dr. Shirley Dawson, MD, on ~~December 21~~<sup>November 21,</sup> 2010 diagnosed Plaintiff Jessica Wilds-Walker with Bipolar Manic Depression Disorder and prescribed her Trazodone 100 mg at HS - medtime as well as Respirodone etc. On February 4, 2011 Dr. Dawson changed the diagnosis from Bipolar Manic depression to Bipolar Affective Disorder ... On February 11, 2011 Dr. Dawson

removed my diagnosis of bipolar disorder and I believe Dr. Dawson changed my mental health code from MH-II to MH-I in order for Security through PSU to transfer me to WSPF on March 10, 2011.

This transfer was and still is involuntary... because I never requested or asked to be sent to WSPF.

18. Plaintiff Wilds-Walker was housed at the Dodge Correctional Institution from Friday October 1, 2010 thru Thursday March 10, 2011 whereas, Institution Psychiatrist Dr. Shirley M. Dawson diagnosed Plaintiff Wilds-Walker as having bipolar manic depression disorder and I believe with a MH-2 designation. In fact she was under a MH-2 designation because it was removed along with the bipolar diagnosis in order to send me to WSPF... because inmates with a MH-2 designation are NOT suppose to be housed at WSPF per a landmark decision ruled by U.S. District Court - Western District of Wisconsin U.S. District Judge Barbara B. Crabb in the case Jones-El et al v. Berge (WD. WI 2001).

19. Plaintiff Wilds-Walker documented medical history profile list numerous psychothrobic medications which has been prescribed for various disorders (e.g. PTSD, bipolar, ADHD, Anxiety, OCD, etc).

Adderall, Concerta, Focalin, Mertzaphine, Trazodone, Depakote, Staratterra, Respirodone, Ritalin, Abilify, ~~Chlorpromazine~~ Chlorpromazine 100 mg, Thioridazine, Fluoxetine (Prozac), Wellbutrin, Zoloft, Doxepin 150 mg, Guafacine, Clonidine, and Diphenhydramine (Benadryl) 100 mg etc.

20. Plaintiff J. Wilds-Walker is currently taking Guafacine and Doxepin, prescribed by Dr. Craig Schnoenecker, MD.

21. The medications as well the ones listed in (Paragraph 19) treats ADHD, PTSD, Bipolar, Mood Disorder, Insomnia, Dysomnia, Mood Swings, OCD, ED, and Sleep problems etc.



22. Plaintiff Jessica Ariana Giselle Wilds-Walker lived as a female in society whereas she took estrogen hormone medications for her breast growth, progestin creams, testosterone blockers, and anti-androgen medications for more than six (6) years which prevented facial hair growth, kept her body soft and feminine and helped her breast. Due to the hormonal medications she plaintiff was taking began to shape her body/transform her body to a more feminine petite and curvey body with an hour-glass frame... to this day her body is still shaped ~~as~~ <sup>like</sup> a female's body... with a 26 inch waist and a 38 inch butt. Plaintiff's body looks like a model from the magazines called Straight Stutin', American Curves, AS'IS, SWEETS etc.

23. Plaintiff Wilds-Walker dressed as a female wearing female clothing, dresses, pantsuits, high heel shoes, lip stick and gloss, make-up, kept her hair and nails done, wore bra's etc.

24. Since being incarcerated within the Wisconsin Department of Corrections the defendant's has refused acknowledge the fact that I prefer to be called she, her, girl, female, woman etc and has continued to refuse or deny her hormone treatment (estrogen), will not allow her sex change or penile surgical removal, panties, brasier's, make up and treatment for facial feminization, thus leading to severe and chronic depression and continued thoughts of self-harm no matter how many times ~~she's~~ <sup>she's</sup> placed on clinical observation status, she will still have thoughts of self-castration, the defendant's thinks that by placing me on observation my symptoms of depression and thoughts of self-castration will go away. It's their way to justify NOT providing me with adequate mental health care, and psychotherapy and hormone treatment (estrogen, facial feminization make up etc).



25. Defendants Gary Boughton, Captain David Gardner and possibly Christa K. Morrison are violating my eighth amendment rights and thirteenth amendment rights by violating the PREA regulations.

By the defendants continuing to violate the Federal PREA regulations by constantly housing me around the same homo-phobic and anti-gay/transphobic inmates whom I continue to get into confrontations/arguments with due to them sexually harassing me in front of unit staff and other inmates by calling me derogatory names and discriminating me is deliberate indifference because the defendants have/has been informed multiple times of my being sexually abused and sexually harassed by inmates on Echo Unit GP range 1 and 2 specifically inmate Hakim Q. Naseer see *Gulley-Fernandez v. Naseer* case no. 16-cv-133 (Ed. Wi. 2016).

I can not succeed in a extremely abusive and hostile environment on Echo GP Unit ranges 1 and 2 around inmates (Germell Lindsey, Ernest Wilson, Hakim Naseer, Kareem Body-etti, Derrick Brooks, Darius Armstrong, Randy Alexander, Matthew Davis, etc... and I can not accomplish my goals if the defendants continue to house me around these inmates in GP period and they know this... which proves deliberate indifference and violations of PREA's regulations).

26. IF Security personnel/the defendants was to house me around inmates like Marcellous L. Walker, Demetrious L. McKinnie, Darian Alexander, Arnold A. David, Quentin Ridgeway, Kenneth Pernel, Jotavious Cheese, DeWayne D. Knight, Clarence Joseph, Marco Torres, Jose Gonzalez-Rios, Damian Allikas, Tremaine Edwards, Carl Avery, Trayvon Smith, Joseph Pitman, Dorin Young, Sean Young, Javell L. Williams, etc. I would/will be able to succeed in G.P.

Status. Why? Because I do get along with ALL of these inmates and I've NEVER had problems with them. Plus - (Marcellous Walker is a Real Close friend and family friend and I've known him and he me since I was 1 years old in 1993 - thats 23 years. And I consider him a Uncle/cousin. Joseph Pitman is my cousin... I'm related to Pitman on his father side. Pitman's nephew Haywood is married to my blood cousin/auntie Kim Townsend which makes ~~me~~ me and Pitman related by marriage etc).

On May 17, 2012, the U.S. Department of Justice released the Final Federal regulations implementing the Prison Rape Elimination Act (PREA). These regulations apply to federal, state and local Correctional Facilities and lock-ups and include key protections for Lesbian, Gay, Bisexual, Transgender and Intersex (LGBTI) individuals. The Plaintiff is a LGBTI Advocate and is a member of the Prisoner Advisory Committee (PAC) in the collective field. etc. see J.M. Grant et al., Injustice at Every Turn: A Report of the National Transgender Discrimination Survey 167-168 (Washington: National Center for Transgender Equality and National Gay and Lesbian Task Force, 2011) available at ~~http://endtransdiscrimination.org/PDFs/NTDS\_Report.pdf~~ [http://endtransdiscrimination.org/PDFs/NTDS\\_Report.pdf](http://endtransdiscrimination.org/PDFs/NTDS_Report.pdf).

27. The defendants will continue to be in violation of PREA regulations as long as they continued to house me around prejudice, discriminatory and hostile anti-gay/transphobic inmates and will continue to be/show deliberate indifference as long as the defendants continue to subject me too extreme emotional distress, Cruel and or Unusual punishment, discrimination, harassment, sexual harassment, sexual verbal abuse etc which violates my 8<sup>th</sup>, 13<sup>th</sup>, 1<sup>st</sup> and 14<sup>th</sup> Amendment rights.

28. Plaintiff's Jessica Wilds-Walker history of living as a woman and suffering Gender Dysphoria/Identity Disorder goes back to her

Childhood years.

29. Jessica Ariana Giselle Wilds-Walker has numerous mental illness defects that are compounded by her Gender Dysphoria which has caused her to cut her arms - to which Unit staff or PSU didn't treat or assess the plaintiff - She still has the scars on her arms from cutting herself numerous times - and the defendant violated Doc Policy # 311.14 which is inmate in danger of self-harm or harm etc. The plaintiff has tried to attempt suicide and threatened suicide and to kill herself numerous times throughout her stay at WSPF and throughout her life.

30. I have been placed on clinical observation for making threats of self-harm, or banging my head on cell door, etc to which I continued to bang my head on the door once placed in OBS status at least 8 times since I been at WSPF, DCI, and EAS etc.

31. Dr. Johnson told the plaintiff Wilds-Walker in May of 2013 that she would refer Wilds-Walker for the "Coping Skills Program" at the Wisconsin Resource Center. Plaintiff Wilds-Walker did clearly inform defendant Dr. Johnson, that she's suffering from Gender identity disorder and that she believes she's a female in a female body not a man and that she has problems coping and Personality Disorder ~~etc~~ and that her mood changes like a traffic light.

Dr. Johnson ignored my claims of GID but did acknowledge that she believes I have Personality Disorder, and problems coping etc. And that if my behavior improves she'll refer me to WRC.

32. Plaintiff Wilds-Walker states Gender Identity Disorder fits the definition of a serious mental illness and is manifested by frequent episodes of depression and functional impairment, suicide and acts of self-harm.



33. It has been known for a long time that those (like myself) suffering from gender dysphoria are prone to mental illness, suffer a great deal of pain and emotional distress and mental deterioration/mental anguish when they are forced to live (a) life as a gender they are uncomfortable with living as for a significant length of time. Plaintiff Jessica Ariana Giselle Wilds-Walker contends this is especially the case for prisoners who suffer from gender identity disorder/gender dysphoria such as herself.

34. It is a known fact in the psychiatric profession that "a considerable number of prisoners who has gender dysphoria when forced to live as men, fell into a semi-fatuous condition, from which it was next to impossible to arouse them, having committed suicide, self-mutilation as well as penis and testicle castration as they find it offensive to their sense of identity. The Plaintiff Jessica Ariana Giselle Wilds-Walker a.k.a. Dominique DeWayne Enriquehakeem Gulley-Fernandez, does find it offensive to have to live with body parts she don't feel comfortable with having and would like to have a sex change surgery procedure to have the offensive penis/testicles surgically removed and receive breast implants and a procedure called Rollin's AirSculpt... Dr. Aaron Rollins, M.D. takes patients' fat usually from the thighs, waist or the abdomen, and then injects the fat into the butt. "The amazing part is, since the patients are awake they give them a mirror and they can give them input such as "bigger", or "rounder" - and effects are permanent (starting at \$4,000). Dr. Aaron Rollins, M.D. is a cosmetic surgeon and Body-Sculpting Specialist and works at Elite Body Sculpture LLC, in Beverly Hills, California. And I would like the defendants to provide me hormone treatment (estrogen)



and make-up products, progestin creams, testosterone blockers, anti-androgen medications, electrolysis etc, until I ~~can~~ have the Sex Change procedure.

35. Wilds-Walker believes Dr. Johnson, Dr. Kallas, Dr. Ankarlo, Warden Gary Boughton, Frmr. Warden Tim Haines, Frmr. Deputy Warden Troy Hermans, Christa Morrison and Captain Gardner, has been deliberately indifferent to her mental health care needs, in a manner of gross negligence as she has spoken to or written to these defendants over the years explaining to them her symptoms of G.I.D. and requesting to be transferred to the Columbia Correctional Inst., Racine Correctional Inst., Waupun Correctional Inst., and/or the Oshkosh Correctional Institution etc, as my mental health treatment needs will be better met and ~~and~~ treated at those prisons because of the high LGBTI population, and TIC housing units for LGBTI as well the Sexual Identity Disorder (SID) programs and hormonal treatment etc., and the fact I have spoken to them each or wrote them each concerning the emotional distress pain and suffering, mental anguish, discrimination, sexual verbal abuse and sexual harassment and prejudice she is suffering, and being forced to live as a man has caused, and has led to much of my negative problematic behaviors that has led her to segregation etc.

36. Dr. Johnson and other PSU staff has known of Wilds-Walker Gender Identity Crisis since ~~August~~ August 2013 as I informed my then Clinician Dr. Torria VanBuren that I have Gender Dysphoria during one of her Seg rounds on Alpha Unit.

Yes, I acknowledge the fact that I have received consistent Psychological care while at WSPF... and that I've been seen and met with numerous PSU Staff since I been at WSPF...  
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However, Not one of those PSU therapy appointment addressed nor focused on just my G.I.D. and other mental disorders... every time I've met with PSU for therapy sessions the ~~clinicians~~ Clinicians Always want to talk about my negative behavior, threats of self-harm, conflicts with other inmates etc... See all PSU Psychological Services Clinical Contact Reports from 2013-present and the court, jury and the defendants will see that I'm not malingering, exaggerating or lying when I say PSU is providing me with inadequate mental health treatment/care, and that PSU is wrong for only having me diagnosed with Anti-Social Personality Disorder - Every individual who has a criminal history, criminal background and dysfunctional childhood has Anti-Social Personality Disorder!! Thus, what about the constant persistent, and frequent flashbacks and symptoms of PTSD, extreme moodswings, (Bipolar) and my persistent, ongoing and frequent discomfort with being forced to live as a man and wanting to castrate my Dick and balls (GID/GP) Maybe I should just get some scissors and actually cut off my Dick and balls?! That's what I'm going to end-up doin' if the defendants continues to deny me adequate treatment, hormone treatment (estrogen) and ~~a~~ Sex Change Surgery etc), which means they have failed to alleviate my mental distress, duh.

37. From August 2013 until January 29, 2015 Dr. Torria VanBuren was assigned as my Clinical psychologist. Plaintiff had a good working relationship with Dr. VanBuren as patient and Clinician. It was Dr. VanBuren who wrote up my referral for mental health placement into the "Coping Skills program" at Wisconsin Resource Center in September 2013. Jeff Neuse at WRC -

Approved the referral for Coping Skills program and treatment for a possible eating disorder Anorexia nervosa etc. I was transferred to WRC on or about November 19, 2013 and I did successfully complete the "Coping Skills program" and received my official certificate for the program. On February 10, 2014 and I returned to WSPF on February 28, 2014.

38. Plaintiff Wilds-Walker believes if there's any complaints related to Dr. Van Buren it is that once it was learned he is a female, and has lived as a girl since 8 years old Dr. Van Buren had an obligation to recommend through Dr. Kallas that Wilds-Walker be evaluated for Gender Identity Disorder (GID) it was never done. This constitutes deliberate indifference to a serious mental health need as both Dr. Van Buren and Dr. Johnson were aware of a situation that I reported to them (e.g. Gender Identity Disorder) and they literally overlooked it, ignored my claims of GID or (literally can't remember me telling them etc).

39. I was forced on my own to write PSU about being evaluated for Gender Dysphoria, and constantly contacting Gary Ankarlo and Kevin Kallas, I don't know if they received my mail everytime I wrote them.

40. Dr. Johnson sent an e-mail to Dr. Kallas at Bureau of Health Services, Mental Health Director, letting him know that I have been stating I ~~was~~ have Gender dysphoria etc.

41. Dr. Kallas ordered PSU Dr. Johnson to have me evaluated for GID. Dr. Johnson assigned the evaluation case to Dr. Crespo, a licensed professional counselor and a Master of Science Psychologist.

Dr. Crespo conducted the GID/GD screening evaluation on July 8, 2015.



~~July 8, 2015.~~

42. Mr. Crespo met with plaintiff Wilds-Ward in the PSU visiting booth approximately 8:00 A.M., and asked numerous questions regarding Gender Identity and Gender Dysphoria. He then informed Plaintiff he'll be writing up a report regarding his evaluation.

43. On August 11, 2015 Mr. Crespo interviewed Plaintiff Wilds-Ward again in the PSU visiting booth on Charlie (GP) Unit as plaintiff was experiencing a bad day and was requesting to go on clinical observation from where she had self-harmed, cutting her arms and wrists.

44. During this said contact, Mr. Crespo informed Plaintiff Wilds-Ward that he was finishing his report concerning her Gender Dysphoria evaluation and that he recommended she see the GIDS specialist Cynthia S. Osborne.

45. Gender Dysphoria is recognized as difficult to withstand; indeed, psychological stressors such as being forced to live as a different gender than the one associated with can be as clinically distressing as physical torture. The adverse effects of being denied to live as a female for one with GIDS are especially significant for persons with serious mental illness like those suffered by Wilds-Ward [Attention Deficit Hyper-Activity disorder, Post Traumatic Stress Disorder, Bipolar Mood disorder, and Gender Identity Disorder, Major depressive disorder], that is usually characterized by psychotic symptoms



and/or significant functional impairments. The stress and anxiety has only exacerbated her symptoms of illness and has provoked her fancy with suicidal ideation and mutilation.

46. Defendant is well aware that leading mental health experts has summarized and concluded that transgenders who suffer gender dysphoria is a condition that causes emotional distress and psychotic breakdowns, severe suicide crisis, floating anxiety and self castration of the offending parts, and yet, has repeatedly ignored his pleads.

47. Plaintiff has tried to kill himself because he's being refused to live as a female and classify herself as she, rather than he, has often swinging moods from deep depression, extreme emotional distress, psychological torture and mental pain.

48. Defendant Boughton as Warden and ~~Greg Herman~~ Troy Nermans as Deputy Warden has been written several times since 2014 <sup>and 2015</sup> requesting a transfer to another facility namely Osh Kosh or Racine Correctional Institution which has a greater transgender population and Osh Kosh which has a better mental health clinical field, yet, her requests has been denied.

49. Due to plaintiff Wilds-Ward living as a female, she believes she'll fit in more better at Osh Kosh Correctional Institution or Racine Correctional Institution which has a large gay/transgender population and has a system in place that provide hormone treatment and estrogen medications.

50. Plaintiff Wilds-Ward has informed Dr. Johnson, Kallas,

as well Dr. Ankarlo that he will castrate his own penis if not treated as she is not a he, but a female and has requested that it be surgically removed.

51. Defendant has ignored these cries of pain ignoring that Wilds-Ward lived as a female in society and was taking hormone (estrogen) treatment which allow breast growth, her hair to grow and suppress the testosterone keeping facial hair from growing, and for make-up, bra's and panties consistent with her lifestyle as a transgender female.

52. DOC policy is being violated as any transgender female that lives as a woman, and was taking hormone treatment in society are allowed to have continued hormone treatment upon her incarceration as repeatedly been held.

53. Defendant has arbitrarily and capriciously refused to follow their own rules, practice and policy concerning transgender female in denying Teriyaki Ariana Wilds-Ward aka Dominique Gulley-Fernandez hormonal therapy and treatment (estrogen) and other medications needed to enhance her breast and femininity as a transgender woman.

54. This refusal and denial by defendants to recognize Plaintiff Wilds-Ward as a she rather than he, and forcing her to appear as a man, rather than which she is comfortable as being (female) has caused Wilds-Ward mental illness to exacerbate to self-harm, numerous attempts to committed suicide by **inducing**

large amounts of medication in an attempt to overdose, to mutilate her arms, wrist, and other parts of her body in suicidal attempts.

**55.** Captain David Gardner is a supervising officer II, and serves as fourth in command at the Wisconsin Secure Program Facility as Administrative Captain, and sits on the classification board along with defendant Catherine Morrison and either Melanie Harper, Tonia L. Clark, <sup>LACY</sup> ~~LEWIS~~ Dickman or Todd Evers in making decisions regarding plaintiffs placement.

**56.** Defendants Morrison and Gardner denied plaintiff's request as well her social worker recommendation to place Wilds-Ward at the Osh Kosh Correctional Institution<sup>or WCI and CCZ</sup> where her needs could be met and treatment began again.

**57.** Defendants has been deliberately indifferent to Plaintiff Wilds-Ward mental health needs, as well her gender dysphoria subjecting her to cruel and unusual punishment, torture and exacerbate her mental illness by keeping her in what's deemed a supermax setting and denying her treatment that's adequate to her mental and physical well-being. In Violation of Plaintiffs' Eighth Amendment and Fourteenth Amendments.

**58.** Defendants are fully aware that they are subjecting her to a waning course of mental stability as her acute episodes alternating with periods of functioning and acute episodes of dysphoria leading to despair, impulsive self-harm, and other disabling symptoms which show a disregard for her health and safety in a deliberately indifferent manner.

59. Research shows that removal of the individual suffering from GIDS and mental illness from the noxious and traumatizing conditions and intensive comprehensive treatment greatly improve prognoses. Plaintiff Wilds-Ward claims she is entitled to the same therapeutic standard in Correctional Mental Health with the same commitment and care as society.

60. Defendants Johnson, Kallas, Ankarlo and others in the mental health profession employed by the State of Wisconsin DOC/BHS are required to try their best to provide Plaintiff Wilds-Ward with intensive treatment, including but not limited to hormonal treatment, and other medications to protect her from repeated traumas that could ultimately lead to death.

61. Defendants Johnson, Kallas, Ankarlo and others in the field of psychology and psychiatry employed by the DOC/BHS knows that it is often an anxiety disorder rather than depression that drives self-harm. It has been widely shown that individuals such as Plaintiff who are transgender are driven to self-harm and intense acts of suicidal acts out of anxiety, and those who repeatedly engage in self-harm are deemed seriously mentally ill.

62. Plaintiff Wilds-Ward has constant flash backs-recalling the past where she was sexually abused, molested, physically beaten for being gay/homosexual, emotionally abused for being homosexual/gay, locked in closets and tortured which she feels is being done to her all over again.



63. Plaintiff Wilds-Ward still witness seeing her relatives being shot and murdered in drive-by shooting on the Northwest side of Milwaukee, and herself being jumped by multiple individuals due to her sexuality as being transgender female.

64. Plaintiff has difficulty and trouble spending time with her friends and other inmates, lose interests in doing ~~things~~ <sup>things</sup> she once enjoyed because others condemn her based of her sexuality causing her to become distressed and hurt emotionally.

65. Plaintiff Wilds-Ward has made it clear to all herein named defendants that the longer they deny her hormone treatment, therapy, estrogen medications, progestin creams, testosterone blockers and anti-androgen medication that she may end up killing herself.

66. All plaintiff claims has been exhausted and raised under the ICRS Complaint system and at times ICE staff has deliberately misplaced plaintiffs ICE's sending them back stating multiple issues as a way of discouraging plaintiff.

67. Plaintiff has written each named defendant herein describing his mental health needs as well his struggles with gender dysphoria the need for estrogen and hormone treatment, as well his need to be at another facility where her needs can be met, defendants has refused to provide those treatments.

~~Plaintiff seeks monetary damages in the amount of \$20,000.~~

~~Plaintiff seeks monetary damages in the amount of \$20,000.~~

68. Dr. Dawn Landers, was the psychologist at Dodge Correctional Institution that ~~felt~~ out the PSU/BOCM referral to send me to WSPF. She lied and said I asked PSU-security to send me to WSPF. I would never ask to be sent to a SUPERMAX prison therefore she lied, she's causing me mental anguish and she slandered my name.

69. Plaintiff seeks a jury trial.

70. Plaintiff seeks monetary judgments in the sum of ~~200,000.00~~ to be determined by the jury.

Dated this 30<sup>th</sup> day of March 2016 (at law library)

Sincerely,

Jessica Wilds-Walker

D. Kelley Fernandez