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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA (FRESNO DIVISION)

JANINE CHANDLER, et al.,

Plaintiffs,

v.

CALIFORNIA DEP'T OF CORRECTIONS
AND REHABILITATION, et al.,

Defendants.

Case No. 1:21-cv-01657-JLT-HBK

**DECLARATION OF NADIA ROMERO
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO MOTION TO
DISMISS**

The declaration of Nadia Romero follows:

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DECLARATION OF NADIA ROMERO
1:21-cv-01657-JLT-HBK

I, Nadia Romero, hereby declare:

1. I make this declaration based on my own personal knowledge, and if called to testify, I could and would do so as follows:
2. I am a Plaintiff in this lawsuit. I am a 44-year-old Hispanic woman currently incarcerated at Central California Women's Facility. I am a grandmother, and mother to four sons. I am also a survivor of a lifetime of physical and sexual abuse starting when I was a young girl.
3. I have struggled with most of my life depression, anxiety, and other mental health symptoms, that have all been exacerbated by violence and exploitation I've been subjected to by men. One of the silver linings of being locked up has always been that it is a mostly-female environment.
4. I filed a grievance (602), a true and correct copy of which is attached to the Defendants' Motion to Dismiss outlining my experiences since SB 132 was implemented, including a description of an incident with one of the men (M.C.H.) who transferred and would grab me hard when he didn't think I was "listening" to him.
5. M.C.H. does not look or act like a woman, or have the mannerisms of a woman. I would say this is pretty typical of the males who have been transferred under SB 132, they don't even look like most of the "transwomen" I have seen from before SB 132, they just look like men.
6. Ever since being housed with M.C.H., and later with other men, my mental health has deteriorated. I have continued to experience panic attacks, I can't sleep, and I sometimes feel like hurting myself. It took months to be able to get a referral to mental health. Knowing that I am at objective risk of being raped or even becoming pregnant, and knowing that it could all be prevented by just keeping men separate from women, has really taken a toll on me.
7. I told CDCR in my grievance that I was at risk of rape or violence from any of the male offenders who have access to me. The prison responded by calling them "transgender females," and they also said that this is the law and there is nothing they can do about it. This was my understanding about SB 132 as well. But I knew I had to try to do something so I did the 602 anyway.

8. I am Catholic and I do not believe that a woman is something you can identify as, it is something you are born. I am a woman because I was born with a woman's body. I have brought children into this world. Not all women do that, but men cannot do that. A person that has a penis is a man. I don't believe that he is any kind of "female" and just because he calls himself female doesn't mean he acts like one. I still want them to be safe in prison, and if they do not feel safe in the men's prison, I think the state should step up and give them a separate facility for all 300 of them. That is the safest for women and for everybody.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was executed on May 26, 2022 at Chowchilla, California.



Nadia Romero