

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

U.S. DISTRICT COURT  
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**FILED**  
JAN - 9 2017  
CLERK, U.S. DISTRICT COURT  
By JGZ:39pm  
Deputy

STATE OF TEXAS

V.

No. 7:16-cv-00054-0

UNITED STATES OF AMERICA

DECLARATION PURSUANT TO 28 U.S.C. § 1746  
IN SUPPORT OF THE MOTION TO INTERVENE

BY Rhonda Fleming # 20446-009

I, Rhonda Fleming, an inmate at FMC Carswell, certify that my bodily privacy rights are being violated by the Defendants housing men in the prison. I suffer an injury anytime I use the bathrooms, showers, or if I am placed in the Special Housing Unit ("SHU"), where female inmates are locked in a cell with men, forced to use the bathroom and shower in front of males.

I am being humiliated and degraded everyday so that men that identify as women can be comfortable. The rights of naturally born women are ignored.

The Defendants are also responsible for violating my rights in the Initiative on Clemency/Clemency Project 2014, by denying women, white collar and other non-violent crimes equal access to a meaningful review, while releasing armed, career offenders, some of whom had sawed off shotguns or sold drugs to children.

The conduct of the Defendants has been anti-women's rights in the matter of my own bodily privacy rights, familial association rights, and the fundamental right I have to an equal access to an opportunity to be released early.

Executed on: January 4, 2017

Rhonda Fleming  
Name/Signature