

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

CODY FLACK and
SARA ANN MAKENZIE,

Plaintiffs,

v.

WISCONSIN DEPARTMENT OF
HEALTH SERVICES and
LINDA SEEMEYER, in her official capacity
as Secretary of the Wisconsin Department
of Health Services,

Defendants.

Case No. 3:18-cv-00309-wmc
Judge William Conley

SUPPLEMENTAL DECLARATION OF SARA ANN MAKENZIE

I, Sara Ann Makenzie, declare as follows:

1. I am one of the plaintiffs in the above-captioned action. I have personal knowledge of the matters stated in this declaration. This declaration supplements the declaration [Dkt. No. 23] I submitted in connection with the motion for preliminary injunction in this case.
2. As I stated in my first declaration, I had a consultation with Dr. Katherine Gast at UW Health in February 2018 to discuss genital reconstruction surgery (bilateral orchiectomy and vaginoplasty) as part of my gender transition and treatment for gender dysphoria.
3. I understood from Dr. Gast that I would need letters of support from two mental health providers before she could perform the surgery. Although I was willing to take the steps necessary to obtain these letters, after learning from Dr. Gast that my insurance would not cover the surgery, I chose not to seek them at the time.
4. Since submitting my original declaration, I have obtained letters of support for surgery from two mental health providers. On June 14, 2018, my treating therapist, Jessica L.

Bellard, MSW, LCSW, CS-IT, of the Sauk County Department of Human Services, sent a letter of support on my behalf to Dr. Gast and provided me a copy of that letter. A copy of that letter is attached to this declaration as Exhibit A.

5. I also sought and obtained an evaluation for eligibility for genital reconstruction surgery from a second mental health provider, Chelsea O'Neil Karcher, MA, LPC-IT, at The Center for Community Healing in Madison, Wisconsin. I met with Ms. Karcher at her office on June 11, 2018 for my evaluation. Following that meeting, on June 25, 2018, Ms. Karcher sent Dr. Gast a letter of support for surgery and provided me a copy of that letter. A copy of that letter is attached to this declaration as Exhibit B.

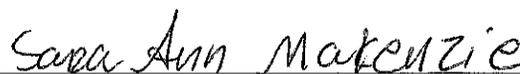
6. On June 25, 2018, after the letters from Ms. Bellard and Ms. Karcher were sent to Dr. Gast, I called Dr. Gast's office and requested that her office submit a prior authorization request for Medicaid coverage of the surgeries we discussed at my consultation in February.

7. On June 27, 2018, I received a telephone call from a woman named Treanna in UW Health's billing office. During that call, Treanna informed me that the surgery I am seeking is not covered under my Medicaid plan. She told me that I could pay out of pocket for the surgery at a price of approximately \$20,800. I cannot afford surgery at that price.

8. To my knowledge, despite my request, UW Health has not submitted a prior authorization request for my surgery as of the date of this declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and information.

Executed this 13th day of July, 2018.


Sara Ann Makenzie