

AARON J. ROMANO, ESQ.
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

JANE DOE	:	CASE NO. 14CV469(RNC)
Plaintiff,	:	
	:	
v.	:	
	:	
CONNECTICUT DEPARTMENT OF	:	<u>Affidavit of Named Plaintiff</u>
	:	
CORRECTIONS; JAMES DZURENDA,	:	
COMMISSIONER; CONNECTICUT	:	
DEPARTMENT OF CHILDREN AND	:	
FAMILIES; JOETTE KATZ,	:	
COMMISSIONER	:	
Defendants.	:	

I, [REDACTED] hereby affirm under penalty of perjury pursuant to 28 U.S.C. §1746 that the following assertions are true and correct:

1. I am a female transgender child.
2. I have been in DCF custody since the age of five.
3. I was placed in DCF custody because my father was incarcerated and my mother was using heroin, crack, alcohol, and possibly other drugs.
4. While in DCF custody I have suffered immensely.
5. I feel that DCF has failed to protect me from harm and I am now thrown into prison because they have refused to help me.

6. The following incidents occurred while I have been in DCF supervision:
- a. At age 8, while I lived in my grandmother's house, my cousin [REDACTED] would force me to have anal sex with him and threatened me that if I ever told he would kill me.
 - b. From age 8 through 12, my uncle [REDACTED] beat me by punching, kicking me and he once bashed my head into a wall over and over all because he caught me playing with dolls.
 - c. At about age 9, my uncle [REDACTED] caught me talking to my mother on the phone telling her how I was being beaten by my uncles and aunts and begging her to help me. He snatched the phone from my hands, kicked me in my head, and told my mother to "go to hell!" He then hung up the phone, and dragged me upstairs by my shirt to my room, threw me on the floor, kicked me and slapped me in my mouth so hard that my mouth started to bleed. He then closed and locked the door for two days without food and water and would not let me out no matter how much I begged and pleaded.
 - d. At about age eleven, my grandfather made me sleep outside on the porch for two days because I couldn't hold my stool and had an accident. He told me, "only animals do that," and if I didn't stop he would treat me like one. After my cousin [REDACTED] forced me to have anal sex with him, I could no longer control my bowels.
 - e. At about age eleven, my aunt [REDACTED] caught me in the bathroom wearing her dress and lipstick and started slapping me, saying, "you're a boy, what the fuck is wrong with you!"
 - f. At about age 12 I was placed by DCF at a residential facility in Egelton School in Massachusetts, where a worker named [REDACTED] used to show the other children

pornographic magazines, and on two occasions I was in his office and he had me perform oral sex on him.

- g. At about age 13, at Connecticut Children's Place, a staff member, [REDACTED] took me off school grounds and took me and another transgender female to the movies and dinner. In the parking lot after dinner, the other transgender female performed oral sex on him and he drove to a more secluded place where we both performed oral sex on him. After that incident he would repeatedly tell me not to tell and buy me small gifts.
- h. At about age 13, at CCP, another boy who was a resident came into my room at night, placed his hand over my mouth and then placed my face into a pillow and anally raped me. He was actually found by a staff member in my closet and I had to pretend I didn't know he was there.
- i. At about age 14, after my stay at CCP, I was sent home by DCF to live with my mother.
- j. At about age 14, my mother's boyfriend [REDACTED] would force me at night to give him oral sex and if I did not, he said he would kill my mother. I would attempt to resist him. This must have happened at least thirty times.
- k. At about age 15, my little sister's father, [REDACTED] once came from behind me and covered my mouth and told me to be quiet or he would gut the shit out of me. I nodded that I understood and he pushed me on my bed, pulled my pants down and began having anal sex with me while shoving my face into a pillow. He was suffocating me and I passed out. All I can remember is waking up with my pants still

down and the house empty.

- l. At about age 15, my mother kicked me out of the house and I went to go live with my friend [REDACTED]. [REDACTED] is the transgender female I was with at CCP when we had oral sex with [REDACTED]. The first night at [REDACTED] house, she threw a huge party. I was drinking and smoking PCP for the first time and I started to dance with [REDACTED] brother [REDACTED]. Then [REDACTED] called me over and said "I would be careful if I was you because my brother is trouble." I laughed and walked back to him and told him I was going to be right back. [REDACTED] nodded his head that he understood. I went downstairs to use the bathroom and while I was washing my hands, [REDACTED] came through the door with his friend [REDACTED]. I looked at them and said "what the fuck are you doing here?" [REDACTED] smiled and grabbed my neck and kissed me. I tried to push him off of me and [REDACTED] then grabbed my arms and pinned them behind my back and [REDACTED] punched me in the face. I then fell onto the floor and [REDACTED] started kicking me. [REDACTED] then pulled out his penis and said "suck my dick bitch!" While I did, he told me that if I told anyone he would kill me.
- m. At about age 15, once I started to hang out with [REDACTED] more, I learned she was an escort. Soon enough, I was working alongside her every night on the corner waiting for a date. One time, this man in a black car pulled up. I got in and he said he wanted a blowjob so we drove to a parking lot. He gave me \$90, I put it in my purse, I gave him oral sex and we finished. As we got closer to the corner where he picked me up, he pulled over, grabbed my hair and purse and calmly told me, "give me your fucking money." I refused and he grabbed me by the hair and smashed my head into

the center console, opened my door and pushed me onto the street and drove away.

- n. The DCF worker would come to the house where my mother lived twice per month. Since I wasn't living there, my mother would call me and tell me to come over when the worker came to visit.
- o. Once I went to meet [REDACTED] at her friend's house in Norwalk, CT. When I got there, she greeted me with a hug and we sat in the living room. A tall, dark man and a tall Spanish man walked into the room and said hello to me. The first man poured me a drink. [REDACTED] was already drunk so I began drinking. Then we smoked some drug that I had never previously experimented with. He gave [REDACTED] and I cocaine to snort. We smoked more of that drug and I passed out. When I woke up, I was beside [REDACTED] naked. I sprang out of bed and woke her up. We both got dressed and when I tried to open the door it was locked. We started to scream and bang on the door and one of the men came through the door and smacked [REDACTED] to the floor and said "shut the fuck up before I kill the both of you. You work for me now." Then I tried to run out and he grabbed me by the hair and slammed my face into the wall. Then two more men walked inside and told [REDACTED] and I to get cleaned up because a customer is coming. [REDACTED] screamed for help and threw stuff at them. One guy left and came back with needles. The other man held me down while the other man stuck her and me with the needles. We instantly fell asleep. Later, [REDACTED] woke me up and said she was going to kill herself before they did. She had a huge piece of glass and asked me if I wanted to kill myself with her. I pushed her to the floor and then the door opened up and two men came in and told us to get ready for a customer and

left. I told [REDACTED] to calm down and hopefully if we tell the customer to help us he will. When we told the customer, he told on us and we were beaten. That was the first and last time we tried to get help. About three weeks later a black man with long dreads came into our room, took out his penis and asked us how old we were. Once I said I was 15 and [REDACTED] said she was 16, the guy looked at us with some type of compassion and then said if we both gave him oral sex and each other, he would help us escape. So we did. Then he said when he would leave, he would call the police. [REDACTED] said "no, help us now. I don't want the police to know. I just want to escape and act like this never happened." I stood quietly and the man gave us his cell phone and said he was going to call us in 15 minutes and then come back with his homeboy. There is only one guy in the house. He then left and called us 20 minutes later. He said, "o.k., I'm with my homeboy and we are on our way. So when that door opens, he's gonna grab the guy up and you run out as fast as you can and don't stop. Ok?" We said that we understood and 30 minutes later the door opened and it was him. We ran out and saw his homeboy strangling the tall guy with rope. We froze and the guy told us to run and "get the fuck out of here." We ran so fast and so long without stopping or looking back and got to the train station. I told [REDACTED] that we should call the police and she looked at me and said, "[REDACTED], shut the fuck up. We're free; what more do you fucking want? Leave those guys alone. Trust me, if we say something we will fucking die if they find us so just shut the fuck up and keep this between us and act like it never happened." We hopped on a train back to Bridgeport and we never spoke about it again.

- p. To be honest, I kind of feel like that never happened. I feel so numb to it all and ever since this has happened, I feel numb to everything because I could go missing and no one would care. But its like this never happened. It's so weird now that I look back on it. Me and [REDACTED] went back to our normal routine escorting and turning tricks and doing drugs after all this shit happened.
- q. At age 15, [REDACTED] and I got in a fight and she kicked me out. I went to my aunt [REDACTED] to stay with her. That is when I started smoking crack with her. We would go out with guys and have sex with them for drugs. This became a daily event.
- r. I remember going to my mother's house one day and she hugged and kissed me and said she loved me and wanted me to come back home. I told her I would think about it and then left.
- s. Later that same night, my aunt and I got all dolled up, smoked crack and went with a guy named [REDACTED] This was the first time after I started prostituting that I felt I didn't want to continue with this lifestyle. I wanted to be a little kid again in my mother's arms and all I wanted was someone to tell me they loved me, that everything would be alright, and that I will never have to live the way I was again. But that never happened and will not happen and I've become okay accepting that this is my life as a transgender 16 year old sex worker who smokes about a pound of crack (obvious exaggeration) every week and does any drugs anyone gives her, from pills, shrooms, k2, angel dust, pcg, acid, and anything to become numb, and will probably not make it to age 25.
7. Even now that I'm sober and out of that situation, I still can't see anything else in my future

besides this.

8. People constantly tell me I can change that but I just can't see myself doing anything else.
9. I have no family.
10. I have no friends.
11. Everyone is always looking at me like I'm an alien because I want to be the female that I am.
12. People treat me like shit and are always saying rude and hurtful comments like, "you're a man, kill yourself, faggot".
13. It's hard for me to accept compliments from people because they are always so mean to me.
14. There have been times I have thought about killing myself, but every time I have tried, I just couldn't go through with it and I don't know why.
15. I really do want help but I just have a hard time seeing a better future for myself
16. All of these incidents cause me constant distress and replay in my head.
17. I am tortured by these memories and I have tried to block them out.
18. I frequently find myself laughing when I remember these incidents. I know its not the right response but its more of a nervous thing.
19. I have been provided with hormone treatments through DCF to further develop female physical characteristics, including breasts.
20. I have historically been placed in residential facilities with other juvenile females.
21. DCF has always treated me as a girl.
22. On April 8, 2014, I was transferred to York CI and am currently being held in an adult facility in the mental health unit.
23. During the day and night, I can hear the other adult inmates screaming, banging, and crying.

24. I find it difficult to fall asleep.
25. I am being held in a prison cell for 22-23 hours per day.
26. I have no contact with peers my own age.
27. I have not been given any educational instruction since coming to York CI.
28. If I were placed in a male correctional facility I fear that I will be assaulted, would experience verbal and physical abuse, stress, anxiety, and I would not feel safe.
29. I can feel myself growing more and more isolated, frustrated, and feeling alone in my current isolation.
30. When I was housed at the Connecticut Juvenile Training School ("CJTS") in similar conditions, I experienced severe emotional stress and trauma and am concerned how this will affect my future.
31. I don't think being placed in isolation or in a male facility would be in my best interest or prepare me to re-enter the community.
32. I need to be given treatment and services specific to my needs. I need to deal with the trauma I've experienced in my life. This prison cannot do that for me.
33. I am willing to cooperate fully with those people who are willing to help me fully.

[REDACTED]

SWORN AND SUBSCRIBED before me Commissioner of the Superior Court, this 12th day of April, 2014, Niantic, CT.

/s/ Aaron D. Romano

Naomi T. Fetterman, Aaron Romano

State Juris No. 430485-415829

Federal Bar No. 6128571 CT 20100