

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS**

JANIAH MONROE,	)	
(a.k.a. Andre Patterson, R67440)	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.
	)	
JOHN BALDWIN, in his official capacity	)	
as director of the Illinois Department of	)	
Corrections,	)	
	)	
Defendant.	)	

**COMPLAINT**

Plaintiff Janiah Monroe, by her undersigned attorneys, for her complaint against defendant John Baldwin alleges as follows:

**INTRODUCTION**

1. Plaintiff is a transgender woman currently housed at Pontiac Correctional Center, a maximum security men's prison. During her time in the Illinois Department of Corrections (IDOC), plaintiff has been repeatedly sexually assaulted, has been subjected to constant sexual harassment, and has experienced several mental health crises – including several suicide attempts and self-mutilation episodes – as a result of inadequately treated gender dysphoria and post-traumatic stress disorder. She is not safe in men's prisons.

2. Out of fear for her own physical safety, plaintiff requested a transfer to a women's prison. IDOC officials refused her request, citing a blanket policy under which housing assignments are made solely on the basis of gender assigned to prisoners at birth. The application of this policy to plaintiff violates plaintiff's right to equal protections and her right to be free