



Lakeesha Harris and Janean Watkins with their children  
Desiree, Kiara, Natasha, Christopher, Ramil and Malcom

## **Affidavit of Janean Watkins**

**IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CHANCERY DIVISION**

<p>JAMES DARBY and PATRICK BOVA, <i>et al.</i>,</p> <p style="padding-left: 40px;">Plaintiffs,</p> <p>v.</p> <p>DAVID ORR, in his official capacity as Cook County Clerk,</p> <p style="padding-left: 40px;">Defendant.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Case No. 12 CH 19718 The Honorable Judge Sophia Hall</p>
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<p>TANYA LAZARO and ELIZABETH "LIZ" MATOS, <i>et al.</i>,</p> <p style="padding-left: 40px;">Plaintiffs,</p> <p>v.</p> <p>DAVID ORR, in his official capacity as Cook County Clerk,</p> <p style="padding-left: 40px;">Defendant.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Case No. 12 CH 19719 The Honorable Judge Sophia Hall</p>
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<p>STATE OF ILLINOIS, <i>ex rel.</i> Lisa Madigan, Attorney General of the State of Illinois,</p> <p style="padding-left: 40px;">Intervenor,</p> <p>CHRISTIE WEBB, in her official capacity as Tazewell County Clerk, and KERRY HIRTZEL, in his official capacity as Effingham County Clerk, DANIEL S. KUHN, in his official capacity as Putnam County Clerk, PATRICIA LYCAN, in her official capacity as Crawford County Clerk, BRENDA BRITTON, in her official capacity as Clay County Clerk,</p> <p>Intervenors.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p style="text-align: center;"><b>AFFIDAVIT OF JANEAN WATKINS</b></p>
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STATE OF LOUISIANA )  
 )  
PARISH OF ORLEANS ) ss.

BEFORE ME, the undersigned Notary Public PERSONALLY CAME AND  
APPEARED: JANEAN WATKINS

Who, after being duly sworn, did state as follows:

1. I am one of the Plaintiffs in this lawsuit.
2. I was born on October 10, 1973, and I am 39 years old.
3. I am in a permanent, loving, and committed relationship of 12 years with Lakeesha Harris, and we wish to marry. Lakeesha also has provided an affidavit and we will try not to repeat each other.
4. I was born in Chicago, IL and have been here ever since.
5. I am a McNair Scholar pursuing a degree in history and work full-time as a copywriter and photographer.
6. I met Lakeesha in 2001 and fell in love instantly, we just knew we wanted to be together and blend our families together.
7. Lakeesha and I are rearing six children: Desiree (20), Kiara (19), Natasha (18), Christopher (16), Ramil (15), and Malcom (13). We all reside in East Garfield Park, Chicago, Cook County, Illinois.
8. We were so excited to be able to get a civil union that we stood in line overnight and were the first couple in Cook County to get a license. On June 2nd, Lakeesha and I entered into a civil union. However, as proud as we and our six children were that day, we all felt, and continue to feel, the hurt of being shut out of marriage and the daily struggle to obtain respect for our family as a result.

9. I have family members who still refer to Lakeesha as my “friend.” If we were married, I know that they would finally recognize her as the important person she is to me and not just a “friend.”

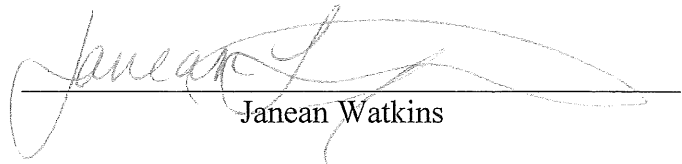
10. It is very important to me to be married to protect my family. When we went to a police station for a restraining order against a person who was stalking one of our teenage daughters, we were asked “Who’s her mother?” and then, “No, who’s her real mother?” After we disclosed to officers that Lakeesha was the biological parent, which was not information we preferred to share in that context, I was shut out and precluded from speaking further to the police officers. I believe that the officers would have treated us differently if I could have said that I was married to Lakeesha, and the experience left me fearful that I cannot keep my family safe. That fear became real again very recently when I took Christopher to a hospital. Christopher is autistic and he needed a refill on a prescription medication. It was a weekend, so I was directed by his doctor’s office to see a doctor at a nearby hospital. When registering, the woman who was helping me insisted that I was not a “real mother” and would not allow me to make medical decisions for Christopher, who I have been raising, alongside Lakeesha, for almost all of his life. I tried to explain that I was his mother, was about to finalize his adoption, and was in a civil union with Lakeesha, but she still refused to assist us. It wasn’t until I was able to recite, out loud, Lakeesha’s Social Security number that she finally allowed us to see a doctor and refill Christopher’s prescription. I strongly feel that if I could have said to that woman that Lakeesha and I were married, that this would not have happened. The experience was devastating, hurtful and offensive. I have been raising Christopher since he was learning to walk and people can say to me, “You are not

important.” It’s a slap in the face. When Christopher’s having problems, I’m there. When he’s up at night, pacing the house because he doesn’t like how he’s being treated at school, I’m there. When he needs to go to the doctor, I’m there. I’m his mother.


11. Lakeesha and I are both over the age of 18, have the capacity to contract, are not within the degrees of consanguinity or affinity prohibited by law for a legal marriage, are not wards under a guardianship, and are not legally married to any other person.

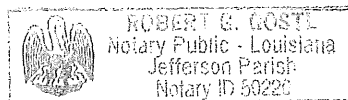
12. On or about the 15th day of May, 2012, Lakeesha and I appeared in person, prepared to tender the \$60 application fee and identification documents, at the office of the Cook County Clerk to request an application for a marriage license so that we could marry each other in the State of Illinois. An employee of the Cook County Clerk declined our request, stating, “Sorry, we don’t issue marriage licenses to same-sex couples.”

13. I hereby declare, under penalties of perjury, that the facts stated in this affidavit are personally known to me, and that they are true.

  
Janean Watkins

Sworn to before me this 22 day of March, 2013

  
Notary Public





Lakeesha Harris and Janean Watkins with their children  
Desiree, Kiara, Natasha, Christopher, Ramil and Malcom

## **Affidavit of Lakeesha Harris**



STATE OF LOUISIANA    )  
  )  
PARISH OF ORLEANS     )

ss.

BEFORE ME, the undersigned Notary Public PERSONALLY CAME AND

APPEARED:                           **LAKEESHA HARRIS**

Who, after being duly sworn, did state as follows:

1.     I am one of the Plaintiffs in this lawsuit.
2.     I was born on April 9, 1975, and I am 37 years old.
3.     I am in a permanent, loving, and committed relationship of 12 years with Janean Watkins, and we wish to marry. Janean also has provided an affidavit. We will try not to repeat things that the other has said.
4.     I was born and raised in Kankakee, Illinois. I am the 2012 Lincoln Laureate of Northeastern Illinois University, obtaining a masters degree in political science.
5.     I met Janean in 2001 and moved to Chicago shortly after that. In 2004, after registering as domestic partners in Chicago, we had a commitment ceremony at our church.
6.     Janean and I reside together in East Garfield Park, Chicago, Cook County, Illinois. Together we are rearing six children: Desiree (20), Kiara (19), Natasha (18), Christopher (1), Ramil (15), and Malcom (13).
7.     We've been there for each other – as a family – through every triumph and for every pitfall; through the good times and the bad. Very much like how any other American family operates. We've stayed up late to nurse an ailing child, gone to church, school social events, taken the children to Florida, Canada, and camping on family trips.



8. Janean and I were so excited to obtain a civil union that we stood in line overnight and were the first in Cook County to get a license. On June 2, 2011, we entered into a civil union in Millennium Park, Chicago, Illinois.

9. Janean and I struggle in many contexts for recognition as a family, as many people do not understand what a civil union means. We also felt hurt when our children asked if we were now married after our civil union, but we had no appropriate word to explain our status, and were left to answer that we are not married but only “civilized.”

10. It is very important that we marry for the sake of our children. They call us “Big Mama” and “Little Mama”. We are a blended family. I fear that lack of respect for our committed relationship to each other will interfere with our ability to protect and provide for our children. We know that if we were able to say “we are married,” it would make a difference to the respect we receive.

11. Recently, we endured a roof collapse which set off a chain of events that completely depleted our savings. I also lost my full time employment. We approached the Illinois Department of Human Services for assistance by way of medical and food subsidies. Though Janean and I went into the office together, put everyone in our family on the application forms, and explained our situation as having a civil union in the state of Illinois, we weren’t recognized as a “real” family. We felt similarly hurt and angry when asked by school officials, “which one of you is the real mother,” as if we must prove our parentage. When we work diligently to educate our six children and equip them with the tools necessary to navigate through our society and teach them to be proud of

who they are – and we're told that we need to prove our familial ties for those very same children – we feel disempowered, humiliated, and oppressed.

12. While waiting to be able to marry, Janean and I have raised six children and experienced the death of our first grandchild. It is sad that although we have shared our lives and experiences for this long that we still cannot marry each other.

13. On or about the 15th day of May, 2012, Janean and I appeared in person, prepared to tender the \$60 application fee and identification documents, at the office of the Cook County Clerk to request an application for a marriage license so that we could marry each other in the State of Illinois. An employee of the Cook County Clerk declined our request, stating, "Sorry, we don't issue marriage licenses to same-sex couples."

14. Janean and I are both over the age of 18, have the capacity to contract, are not within the degrees of consanguinity or affinity prohibited by law for a legal marriage, are not wards under a guardianship, and are not legally married to any other person

15. I hereby declare, under penalties of perjury, that the facts stated in this affidavit are personally known to me, and that they are true.



Lakeesha Harris

Sworn to before me this 22 day of MARCH, 2013



Notary Public

