

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ALISHEA KINGDOM, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 1:25-cv-00691-RCL

**DECLARATION OF ALISHEA
SOPHIA KINGDOM**

My name is Alishea Sophia Kingdom.¹ I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, pursuant to 26 U.S.C. § 1746, I declare:

1. I am a 34-year-old transgender woman in the custody of the Bureau of Corrections (“BOP”). I am currently incarcerated at Fairton Federal Correctional Institution (“FCI Fairton”).

2. I have been aware that my gender identity is female since childhood. Growing up in Wisconsin, around age 7, I remember being sad and upset when I learned that my body was not like my girl cousins’ bodies, because I knew I was a girl, too. When my uncles bought me G.I. Joes, I would dress them up in my sister’s Barbies’ clothes. My mom would buy “boy’s” bedspreads for me and “girl’s” bedspreads for my sister. I would sometimes borrow a princesses blanket from my sister and sleep with it underneath my Ninja Turtles blanket.

¹ My legal name is Joshua Mueller. My Federal Bureau of Prisons Register Number is 13131-089.

3. Because she thought I was either gay or too feminine, my mom started sending me to various mental health centers and boys' residential programs, starting when I was around age 10. While it hurt to know that she thought there was something wrong with me, I also found a certain sense of freedom in some of this time away from home. While my mom would always tell me to speak in a deeper voice or walk like a boy, I was free to express myself in some of the group homes.

4. When I started going through male puberty, I really knew something was wrong—that I should be growing into a woman. I started to feel intense anxiety. I had regular panic attacks, especially when I started to grow facial hair. I couldn't sleep, and I would break out into cold sweats as I lay awake worrying about my body and how uncomfortable I was with my body masculinizing.

5. I came out as a transgender woman when I was a teenager, and began wearing typically-female clothing, hairstyles and cosmetics.

6. Because I did not have access to doctors who could treat my gender dysphoria, starting around age 17, I would get estrogen pills from a friend. I did this because I was desperate to alleviate my dysphoria.

7. I was arrested when I was 19 years old, served a sentence in state prison, and I have been in BOP custody since I was 23 years old.

8. BOP providers diagnosed me with gender dysphoria in 2016. Later in 2016, I saw an endocrinologist who prescribed me hormone therapy.

9. I was also approved to get commissary items like women's undergarments and cosmetics to alleviate my gender dysphoria in 2016.

10. It was a huge relief to be able to be on hormones again and access items to help me present as the woman I know myself to be.

11. Last year I went before the Transgender Executive Council (TEC) so they could review me for surgery to further alleviate my gender dysphoria.

12. On January 26, 2025, I was supposed to receive my regular hormone shot but was denied care. BOP staff told me that, because of President Trump's Executive Order, they would no longer provide care to transgender people at FCI Fairton.

13. On or about January 26, 2025, FCI Fairton removed all commissary items that transgender women previously had access to in alignment with our gender identity.

14. On or about January 26, 2025, FCI Fairton changed its regulations for searches to allow male guards to do visual and pat down searches of trans women. BOP staff also stopped using correct pronouns or avoiding using pronouns (such as by calling someone inmate and their last name) and began to misgender people, saying that under the EO they are not allowed to use female pronouns for transgender women.

15. All books with LGBTQ+ themes have been removed from the FCI Fairton library. When I asked Administrative Supervisor Bergensen why the books were removed, he told me that the prison couldn't "promote" anything dealing with LGBTQ+ identity.

16. On February 6, 2025, I was supposed to receive another shot, but again was told that I could not receive care because of the Executive Order.

17. I submitted a BP-08 grievance on February 4, 2025, grieving that I was no longer able to access treatment for gender dysphoria because of the Executive Order.

18. I received a response to my BP-08 grievance on February 6, 2025, containing language from the Executive Order with no additional response to my grievance. The response

read, “Executive Order ‘Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government,’ signed by President Donald Trump on January 20, 2025, states in Section 4(c) that the Attorney General shall ensure that the Bureau of Prisons revises its policies concerning medical care to be consistent with this order and shall ensure that no federal funds are expended for any medical procedure, treatment, or drug for the purpose of conforming an inmate's appearance to that of the opposite sex.”

19. I had been scheduled to receive another shot on February 12, 2025, but again was denied care with BOP staff saying that the Executive Order did not allow me to access health care for my gender dysphoria.

20. On February 27, 2025, I spoke with Clinical Director Martin and asked when I would be receiving my hormone therapy. Director Martin informed me that I would not be receiving my shots, and that BOP was receiving new policies confirming the denial of hormone therapy.

21. After approximately a decade of receiving hormone therapy while in BOP custody, I have now been cut off from access to this medication. After more than a month without care, my gender dysphoria has become incapacitating. The distress of losing my care has caused me to experience anxiety, panic attacks, and mood swings, and I have been unable to sleep. Losing my care has caused me to feel hopeless, and I have begun having suicidal thoughts as a result. I frequently find myself thinking, I would rather not live than be forced to live as a man.

22. I was due to be further evaluated for surgical treatment for my gender dysphoria this March 2025, but with the shutdown of the TEC, there is now no avenue for me to continue

to seek surgery. This causes me extreme distress. I regularly think about taking a pair of scissors and removing my own genitals to end the pain of my dysphoria.

I, Alicia Sophia Kingdom, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

Dated: 03/04/2025

/s/ Alishea Sophia Kingdom
Alishea Sophia Kingdom

I, Shawn Thomas Meerkamper, certify that I have read the foregoing to Alishea Kingdom, and that she affirmed that the foregoing is true and correct on 03/04/2025.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 03/13/2025

/s/ Shawn Thomas Meerkamper
Shawn Thomas Meerkamper