

**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 JAS KAPULE**

My name is Jas Kapule.<sup>1</sup> I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, pursuant to 28 U.S.C. § 1746, I declare:

1. I am a 35-year-old transgender man in the custody of the Federal Bureau of Prisons (“BOP”). I am currently incarcerated at Federal Correctional Institution (“FCI”) Waseca.

2. When people ask me why I’m trans, I just say I’ve always been like this. I knew I was a boy when I was five years old. When I was growing up, I tried to make my family happy and tried to be feminine, but it never felt right when people saw me as a girl. I was never comfortable with femininity and always wanted to present as a boy. People would mistake me for a boy sometimes, and I would be happy when they did.

3. After high school, when I was around 18 years old, I realized I wanted to be myself and try to be happy. I was deeply depressed trying to be someone I am not, and not accepting myself, so I started living as who I am, a man. I still struggled with dysphoria and

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<sup>1</sup> My legal name is Jasmine Lalani Kapule. My Federal Bureau of Prisons Register Number is 97856-298.

started using drugs as a coping mechanism. If I had known about hormones to treat gender dysphoria, I would have started them then.

4. I have been in federal prison since 2020. My current release date is in 2028.

5. Shortly after I entered BOP custody in 2020, I began to seek hormone therapy for my gender dysphoria. In 2022, I was diagnosed with gender dysphoria and began receiving hormone replacement therapy. I have continued taking testosterone as a treatment for gender dysphoria since then.

6. Being on hormone therapy has dramatically changed my life for the better. My lifelong depression finally began to lift. When my period ended due to the hormone therapy, I felt like I had turned over a whole new leaf and finally began feeling comfortable in my body.

7. Since approximately 2022, I have also been able to access commissary items that matched my gender identity, such as men's underwear and chest binders. This has helped decrease discomfort with how I dress and present myself.

8. Last year, in 2024, I began pursuing "top surgery"—a double mastectomy to further treat my gender dysphoria. I met with Assistant Warden Davis, who evaluated me. Assistant Warden Davis referred me to Dr. Reyna, the facility's chief psychologist, who confirmed my gender dysphoria diagnosis and referred me to the Transgender Executive Council (TEC). On December 19, 2024, Assistant Warden Davis sent me a message saying that the TEC had reviewed my case and made the following recommendations: "Hormone levels are on target and have been consistent. Clear conduct since July 2023. \*WASPB [Women and Special Populations Branch] to initiate a surgical referral to HSD [Health Services Department] for further review." I was waiting for a final response when the Executive Order was issued.

9. When I went to get my hormone shot on January 23, 2025, I asked if I would still be allowed to access care for gender dysphoria. BOP staff told me that I would get my shot that day, and that would continue until they heard how to implement the Executive Order from central office. BOP staff have since told me that my hormone therapy will be discontinued when my current prescription runs out. On March 12, 2025, I asked the staff person who gave me my injection when my prescription runs out, and she could not or would not tell me.

10. On January 31, 2025, BOP staff posted a bulletin about President Trump issuing an Executive Order. The bulletin said that inmates could no longer contact the Transgender Executive Council and that it is being ended.

11. The prison has also stopped offering a class led by a BOP staff member called Emerging Identities, where we discussed and learned about identity, including gender identity. The FCI Waseca staff member who used to lead the class later gathered us together told us the class was on hold due to the Executive Order.

12. On February 24, 2025, BOP staff told us that we could no longer receive or purchase chest binders to address dysphoria related to our chests. The next day, February 25, 2025, BOP staff told us that we had to turn in our boxers as we were now forbidden from wearing them. They gave us panties to wear. I did not even know what size to ask for, as I haven't worn them in years. It felt degrading to have even our underwear taken away from us.

13. Ever since President Trump issued the Executive Order, I have been afraid that that BOP will take away the medication that allows me to live as my true self. Now that I am finally in a place where I feel ok, I am scared that I will be forcibly detransitioned and taken back to a very bad place, mentally. I am particularly afraid of my period returning and the depression and dysphoria it will cause.

14. Because the TEC has been abolished, I will not be able to access surgery to alleviate my gender dysphoria, as I was awaiting a decision from them. When I asked Assistant Warden Davis about my surgery on February 25, 2025, I was told that everything is stopped and that I will not have surgery as it was still in process when the Executive Order was issued.

15. I submitted a BP-10 grievance form on February 12, 2025, by certified mail. I used a BP-10 regional grievance form because I knew that FCI-Waseca cannot remedy my situation because of the Federal policy change. I grieved the loss of access to surgical care and the impending loss of other care for my gender dysphoria. I received a response advising me to resubmit my grievance as a BP-08 grievance. I filed my BP-08 as instructed on March 3, 2025, and the unit manager received it on March 7, 2025. On March 12, 2025, I received a response to that BP-08 which stated, "Pursuant to President Trump's January 20, 2025 Executive Order, 'Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government,' the Transgender Offender Manual was rescinded. Until further notice, the Bureau of Prisons will follow any updated policies published by the Department of Justice.' I also appealed the response to my BP-10 by filing a BP-11 on March 6, again grieving the loss of access to surgical care and the impending loss of other care for my gender dysphoria.

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

Dated: 03/12/2025

/s/ Jas Kapule  
Jas Kapule

I, Shawn Thomas Meerkamper, certify that I have read the foregoing to Jas Kapule, and that he affirmed that the foregoing is true and correct on 03/12/2025.

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

Dated: 03/13/2025

/s/ Shawn Thomas Meerkamper  
Shawn Thomas Meerkamper