

**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

**SUPPLEMENTAL 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. In my previous declaration, I said that I was diagnosed with gender dysphoria and started hormone therapy in 2022. Since executing that declaration, I have reviewed medical records that were previously not in my possession, and I now recall that it was in March 2023 that I was diagnosed with gender dysphoria and started hormone therapy.

2. In my previous declaration, I said that Dr. Reyna had confirmed my gender dysphoria diagnosis in 2024. Since executing that declaration, I have reviewed medical records that were previously not in my possession, and I now recall that Dr. Reyna did not comment on my diagnosis, but instead referred me directly to the TEC to discuss top surgery.

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

3. As of April 3, 2025, it is still my understanding that my hormone therapy will be discontinued when my current prescription runs out. No BOP staff have informed me of when my current prescription ends.

4. The week of March 17, 2025, a group of new arrivals were intaked at FCI Waseca. Those new arrivals who were transgender men had their binders and boxers confiscated, regardless of whether they had purchased those items for themselves.

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

Dated: 04/03/2025

/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 04/03/2025.

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

Dated: 04/03/2025

/s/ Shawn Thomas Meerkamper  
Shawn Thomas Meerkamper