

**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 AYANA  
SATYAGRAHI**

My name is Ayana Satyagrahi.<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 originally from Galveston, Texas. I am a 50-year-old transgender woman currently incarcerated at Federal Correctional Institution (“FCI”) Seagoville, a low-security facility. I am one of approximately 36 transgender women at FCI Seagoville. I have been in Federal Bureau of Prisons (“BOP”) custody since 2010.

2. I was diagnosed with gender dysphoria and started hormone therapy to treat my dysphoria in 2004, prior to being incarcerated. Since entering BOP custody in 2010, BOP has repeatedly confirmed my diagnosis and has been providing me with hormone therapy since 2010.

3. On February 24, 2025, Warden Phillips called all of the trans women at FCI Seagoville into the facility’s auditorium and announced that, because of President Trump’s Executive Order, the facility would be confiscating the dresses and undergarments we had

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<sup>1</sup> Although a district court in Leavenworth County, Kansas legally changed my name to Ayana Satyagrahi, BOP has not changed my name in its system. My BOP Register Number is 43636-279.

received through the facility laundry; cutting off access to new bras and panties through either commissary or the laundry system, as well as access to cosmetics through commissary; ending programming aimed at supporting transgender people at the facility; and no longer providing electrolysis treatments or surgeries to treat gender dysphoria. Warden Phillips also said at that meeting that BOP would be weaning all of us off hormone therapy as soon as guidance was issued.

4. Before FCI Seagoville changed its policies to comply with President Trump's Executive order, I had been receiving laser hair removal treatments for approximately eight months. Because facial hair so severely exacerbates my gender dysphoria, BOP medical providers had determined that facial hair removal was medically necessary to treat my gender dysphoria. However, after February 24, 2025, BOP staff ended these treatments, and I have not had any since. No BOP medical provider spoke with me individually before stopping my laser hair removal treatments. Two other transgender women at FCI Seagoville also had their laser hair removal treatments stopped; as far as I know, they also did not speak with a medical provider before their treatments were stopped.

5. Since February 24, 2025, staff at FCI Seagoville have been consistently telling me that President Trump's Executive Order means that hormone therapy for gender dysphoria will be ended for everyone in BOP custody. All of the other transgender women I know at FCI Seagoville have also been told that hormone therapy will be ending for everyone because of the Executive Order. No one will tell us when this will happen, only that it is coming. BOP staff have told me this as recently as the week of March 24, 2025.

6. I have been receiving hormone therapy to treat my gender dysphoria for over twenty years. The fact that I may suddenly lose access to this care is devastating. Because of the

potential loss of hormones, the end of my facial electrolysis treatments, and denial of appropriate clothing, I have been having near constant thoughts of self-harm.

I, Ayana Satyagrahi, 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/ Ayana Satyagrahi  
Ayana Satyagrahi

I, Shawn Thomas Meerkamper, certify that I have read the foregoing to Ayana Satyagrahi, and that she 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