

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.¹ 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 one of the named Plaintiffs in this action. I am a transgender man currently incarcerated at Federal Correctional Institution (FCI) Waseca.
2. In late 2025, the medical staff at FCI Waseca lowered my testosterone dose without informing or consulting me. I only found out after the fact, after I had begun experiencing the effects of the lowered dose. It was a horrible experience.
3. In November of 2025, I started noticing emotional changes. I felt angry and impatient more often than was normal for me, and my depression and anxiety were worse. I felt really emotional all the time. In December, I started getting extremely bad uterine cramps.
4. Around December 2025, when I was getting my biweekly testosterone shot, the nurse mentioned that my dose had been lowered to 150 milligrams. The last I had been told, my dose had been 200 milligrams. It had been constant at 200 milligrams for about two years.
5. I spoke to Ms. Peterson, the Health Services Administrator, about my testosterone dose being lowered at mainline in December. She told me that the pharmacy had lowered my dose because my bloodwork showed that my testosterone levels were too high. I asked her a few times at mainline what my levels were, but she wouldn't tell me or show me.
6. I then got my menstrual period in early 2026 for the first time in two years. I was also getting cramps outside of my menstrual period. Getting my period makes my gender dysphoria much worse. I was devastated. I felt humiliated and emasculated. I had to borrow panties from someone else because I needed to use a pad, which I couldn't use when wearing boxers. I even got my period twice in the month of March, with only one week off of it.

¹ My legal name is Jasmine Kapule. My Federal Bureau of Prisons register number is 97856-298.

7. In early March of 2026, my testosterone dose was raised back up to 175 milligrams. I told Dr. Moore about the negative effects that I had been experiencing, such as the mood swings and my period returning, and she agreed that I needed a higher dose in order to effectively treat my gender dysphoria.
8. I am still feeling the effects of my testosterone dose being lowered. I isolated myself, withdrawing from supportive relationships with friends and loved ones. Being on hormones made me feel like I was able to climb out of a hole I had been in for a long time; being tapered made me feel like I had been dragged back down into that hole. Although I have been back on a higher dose for a bit over a month, I still feel like I am climbing back out. Since my dose was increased, I have felt more hopeful and upbeat. My emotions are still unstable, and my anxiety and depression are still worse than usual, but they have started to improve a bit since my dose was increased. It will likely be a couple of months before my menstrual period stops again, and it feels frustrating, like I have to go through the whole process that I went through just to get back to the point I was before my dose was lowered.
9. I am so scared about the new gender dysphoria treatment policy that the BOP announced. When the policy was posted on the bulletin boards at Waseca, all of the trans people were really afraid that our hormones were going to be tapered. My old partner from the PAWS service dog training program, a transgender woman, woke me up and showed me the new policy. My heart dropped. I felt extremely anxious, and I started to feel depressed and lost. A bunch of other transgender guys at Waseca came to me because they knew I was a part of this case, asking what was going to happen because they were scared. I had already had my dose lowered, and the effects of that were horrible for me. The mood swings and mental health effects were really bad, and getting my period for the first time after two years was horrible, and it made my dysphoria so much worse.
10. I know how being subjected to this new policy would feel because of how BOP very recently tapered my hormone dose. When my testosterone dose was lowered, I was a mess. I am usually a very “together” person, but when BOP tapered my hormones, my close friends told me that they were worried about me because I was much more emotional, breaking down from the distress and anxiety that came with my dose being lowered. My transition has been a crucial piece of my sobriety. Before I could fully accept myself and begin my transition, I numbed the pain with substance abuse -- which is how I wound up in prison in the first place. I would feel hopeless, and I would worry about my ability to maintain my sobriety if I were under constant threat of losing my hormones.

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

Dated: 04/14/2026

/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 04/14/2026.

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

Dated: 04/14/2026

/s/ Shawn Thomas Meerkamper
Shawn Thomas Meerkamper