

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

JANE DOE, et al.,

Plaintiffs,

v.

JAMES R. MCHENRY III, *in his official capacity as* Acting Attorney General of the United States; WILLIAM LOTHROP, *in his official capacity as* Acting Director of the Federal Bureau of Prisons,

Defendants.

Case No.: 1:25-cv-00286

DECLARATION OF JANE DOE

I, Jane Doe, declare:

1. I am currently incarcerated in the Bureau of Prisons. I am submitting this declaration in support of my request for relief. I am using the pseudonym Jane Doe to protect myself.

2. I am a transgender woman. I was born male, but [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. [REDACTED], my distress, anxiety and depression became so bad that I reached out to mental health and medical staff. I was diagnosed with gender dysphoria and began taking hormone medications [REDACTED]. Those medications have saved my life. I would not be able to function without them.

4. I also socially transitioned at that time and have been living as a woman in the BOP [REDACTED]

[REDACTED]

5. BOP doctors [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED] I have been housed here ever since and would be very afraid to go back to a men's facility. I feel much safer here and being here has helped the trauma that I experience

[REDACTED]

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9. On January [REDACTED] 2025, guards removed all of the transgender women, including me, from our housing units and [REDACTED]. The Warden and many other staff were there. The Warden informed us that we were being moved to a separate housing unit. They told all of us that this was happening because of the President's Executive Order.

10. The Warden also told us that we would all be transferred to men's facilities and that the paperwork for those transfers was already being processed. They said the transfers would happen that week and no later than Thursday, January 30.

11. On January [REDACTED] staff moved all of us back to general population. We were not told why we were being moved back and tried to get information. As far as I know, the transfers are still happening [REDACTED]. I am very afraid that I could be moved at any moment.

12. I am terrified of going back to a men's prison, especially if I will not have any access to my long-term medical care. I know that this will cause [REDACTED] and all of my symptoms from gender dysphoria to return. I am also terrified of having pat searches by men which I have not experienced [REDACTED] and being forced to shower with men. [REDACTED]
[REDACTED] Some staff have already started calling me and the other women "men," which has been extremely upsetting.

13. I also know the Executive Order requires the BOP to cut off hormone therapy and other medical treatments for transgender people.

14. I have been taking hormones [REDACTED]. This will be incredibly dangerous for me. I am afraid that without medication, I will go back to feeling like there is no purpose for me to live. I know that my birth sex is male, but I have lived as a woman [REDACTED] and could never go back.

I declare pursuant to 28 U.S.C. § 1746 and under penalty of perjury that the foregoing is true and correct.

Dated: _____

Jane Doe¹

¹ Ms. Doe has reviewed and approved the contents of this Declaration. Because Ms. Doe is incarcerated, a copy of the Declaration has been sent to her via first-class mail. Ms. Doe's counsel will submit a copy of the signed Declaration when they receive it from her.