

# EXHIBIT 2

**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 GRACE PINSON**

My name is Grace Pinson.<sup>1</sup> I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, pursuant to 26 U.S.C. § 1746, I declare:

1. I am a 39-year-old transgender woman in the custody of the Federal Bureau of Prisons. I am currently incarcerated at Federal Correctional Institution (FCI) Butner Medium I.
2. I was diagnosed with gender dysphoria by Dr. Elizabeth Weiner at the Federal Medical Center in Springfield, Missouri in 2014. In 2015, to treat my gender dysphoria, I was prescribed hormone replacement therapy. In 2017, I got access to social accommodation items such as feminine clothing, female hygiene items, and makeup to treat my gender dysphoria as well.
3. When President Trump's "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to Government" Executive Order was issued, I was incarcerated at FCI El Reno in Oklahoma. I was transferred to FCI Butner in February of 2025.
4. Prior to the Executive Order, including for the first week that I was at FCI Butner, I had been able to access social accommodations such as female undergarments, female hygiene items, female-only pat and visual search exemption, and makeup.
5. On February 28, 2025, after the Executive Order was issued, I lost access to all of those social accommodations. Officers came to my cell to take my undergarments and makeup and said they were doing so "on orders of the President of the United States."

---

<sup>1</sup> My legal name is Jeremy Pinson. My Federal Bureau of Prisons Register Number is 16267-064.

6. I have tried to file multiple grievances about losing the female-only pat and visual search exemption in particular. I have filed at least 3 grievances about that, but each time the grievance goes missing, and staff tell me they don't know what happened to it.
7. There are no commissary items available from the transgender list at FCI Butner. I tried to give the head of commissary, Mr. Salley, a copy of the preliminary injunction, and he told me that he would not read it and that, until the central office tells him to do anything differently, the president's order supersedes the judge's order. Whenever I raise any concerns about access to gender-affirming social accommodations or about how I'm treated, staff usually say "tell it to the judge."
8. In June or July of 2025, I received a notice from the Transgender Law Center that a preliminary injunction and class certification had been granted in the *Kingdom v. Trump* lawsuit, along with a copy of the judge's order.
9. Because I am currently incarcerated in a BOP facility and I have a diagnosis of gender dysphoria, I believe that I am a member of the *Kingdom v. Trump* class.
10. I have experienced retaliation from officers at FCI Butner for my involvement in the *Kingdom v. Trump* case.
11. Since October 9, I have been housed in the Secure Mental Health Unit, which is basically like a Special Housing Unit (SHU) except FCI Butner doesn't have a dedicated SHU.
12. On October 17, Lieutenant Quinones was taking me out of my cell in the Secure Mental Health Unit. As he put the handcuff on my left wrist, it slit my skin and it started bleeding. I told him to stop and that he was manhandling me. Lt. Quinones then grabbed my right wrist and started pulling on it hard, slamming me into the cell door. My wrist, hand, and arm were broken when Lt. Quinones did this. Then, Lt. Quinones opened the door and brought me out into the hallway. He cut my clothes off of my body. There were other guards and cisgender men in cells that could see me. I started yelling that it was a PREA violation. The guards walked me down the hallway completely naked and exposed and then put me in a suicide observation cell. In the suicide observation cell, they put me in a belly chain, handcuffs that attached to the belly chain, and leg restraints. I was left there, restrained and naked, for 10 hours.
13. After about 6 hours, Captain S. Hock came into the cell. I was scared. He said "Don't play the victim, I know what you've been writing to that judge in D.C. You did the crime and put yourself here. You know you were born with a penis and would be put in a male prison. The judge doesn't run this prison, I run this prison, and I'll do what I see fit." At the time that Captain Hock came into my cell, my hand had swollen to double its normal size and was darkened with bruising.
14. I did not receive any medical attention for my wrist until around October 23 when they took me to medical for x-rays. For the six days between breaking my wrist and having it seen by medical, I was not provided with any pain medication. I have since learned that my wrist healed improperly because I wasn't provided with medical attention to set it properly. The bones healed unevenly, and I still experience pain every time I use my

wrist. I have been told that if I want it to heal properly, I will need to have a hand surgeon break my wrist again and reset it.

15. Around the same time, I also injured my leg falling from the top bunk. A blood vessel in my leg burst and I had a softball sized lump in my leg. I asked for medical attention for 10 days. Eventually, on November 6, I was running a temperature of 103 degrees, and a doctor came to see me. The doctor said, "Oh my God she's got sepsis, we need to call 911 right now." I was then taken to the hospital where I had emergency surgery and was admitted to the hospital where I was given IV antibiotics for 7 days in the Intensive Care Unit.
16. On November 20, 2025, Captain S. Hock pulled me and my cellmate, Mya Dye, out of our cell and put us in the showers. The captain was in the shower doorway staring at me naked, and I said that it was a PREA violation. The captain responded that I'm a "man in a man's prison" and so it wasn't a problem. The captain threatened to prevent my scheduled transfer to a halfway house and prolong my stay at Butner by ordering that I undergo a threat assessment.
17. The captain then instructed Officer J. Blankenship to perform a digital cavity rectal search where Officer Blankenship stuck his fingers in my anus and spread it apart. Officer Blankenship and Captain Hock were laughing as the search occurred.
18. Since then, I have been held in solitary confinement. The air conditioning is running full blast and the lights are on 24 hours a day. They took away all of my reading materials and legal materials. I sold some of my food trays to other incarcerated people in order to get writing paper and stamps to file grievances and send a letter to my lawyers.
19. On October 10, 2025, staff also froze my email account under an "investigation hold" so I have not been able to send any emails or otherwise contact my attorneys.
20. These incidents individually and collectively have exacerbated my depression, anxiety, and PTSD. Not being able to shave or wear undergarments consistent with my gender identity, and not having female makeup, all exacerbates my gender dysphoria. I have had thoughts of castrating myself, situations where I have been very fearful and broken down in tears. The whole situation has been degrading, demeaning, and dehumanizing. I just wish these people had the willingness to treat me with more decency and dignity than they have.

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

Dated: 12/15/2025

/s/ Grace Pinson  
Grace Pinson

I, Megan Noor, certify that I have read the foregoing to Grace Pinson, and that she affirmed that the foregoing is true and correct on 12/15/2025.

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

Dated: 12/15/2025

/s/ Megan Noor  
Megan Noor