

# EXHIBIT 7

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

ALISHEA KINGDOM, et al.,

*Plaintiffs,*

vs.

DONALD J. TRUMP, et al.,

*Defendants.*

Civil Action No. 1:25-cv-00691-RCL

**DECLARATION OF GRACE PINSON**

My name is Grace Pinson. 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 currently incarcerated at FCI Butner. I was scheduled to be transferred to a residential reentry center (also known as a halfway house) on January 2, 2026. This was based on my accumulation of good time credits—which amounted to one day short of the maximum I could obtain.
2. On December 18, 2025, Dr. Madler, a BOP psychologist, and Unit Manager Privette stated that my transfer to a residential reentry center had been revoked. Dr. Madler and Unit Manager Privette stated that the residential reentry manager made the decision to revoke my transfer because I complained that I had not received adequate treatment for my gender dysphoria at Butner. Madler and Privette stated that, because the residential reentry center would not or could not provide treatment for my condition, I could not go there.
3. I do not believe this explanation because Butner also is not providing me adequate care for my gender dysphoria. For instance, I have not received an estrogen shot since mid-December. Nurse Marucha said my access to hormones was under review by Dr. Lawrence Sichel, a doctor I have never seen. Transgender women in the prison do not have access to social

accommodation items, such as gender-appropriate undergarments. My requests for gender affirming surgery have been met with laughter by BOP officials. Staff, including clinical staff, fail to use the right pronouns for me and other transgender residents.

4. Dr. Madler and Unit Manager Privette said that FCI Butner had nothing to do with the revocation of my transfer. I do not believe this either: On November 20, Captain Hock, a BOP official, told me that my transfer would be revoked if I continued sharing information about the prison's noncompliance with Judge Lamberth's order.
5. At the time I was told about the cancellation of my transfer, I resided in the Secure Mental Health Unit based on disciplinary charges. Several weeks after being placed in that unit, a BOP hearing officer acquitted me of those charges; thus, the charges could not have been the basis for the revocation of my transfer.
6. After the hearing officer's decision, BOP officials transported me from the Secure Mental Health Unit back to general population. Since December 18, I have been housed in a dormitory style cubicle area. When I change my clothes, the 29 other inmates in the dormitory—all of whom are men—can watch me change, and many do. I have faced sexual harassment on a daily basis.
7. The revocation of my transfer has had significant effects on me and my family. For instance, my mother was scheduled to undergo a cardiac catheterization on January 13 and requires a medical chaperone to do so. If I been able to reside at the residential reentry center, I would have played that role for her; because I will not be transferred, there is no one to serve as her chaperone and drive her back from the surgery, and the hospital has cancelled it. My mother wrote to the Court to share this concern with it.

8. I cannot sleep at night and experience depression and thoughts of suicide. Just days ago, I was supposed to be transferred to a halfway house—to be on the other side of the fence. Now, I remain caged. My mother cannot receive the medical care she desperately needs. Other prisoners receive the message that speaking out will result in retaliation. And I have been deprived of the modicum of freedom I worked hard to earn.

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

Dated: January 12, 2026

/s/ Grace Pinson  
Grace Pinson

I, Michael Perloff, certify that I have read the foregoing to Grace Pinson, and that she affirmed that it is true and correct and authorized me to type her signature on the line above on January 12, 2026.

Dated: January 12, 2026

/s/ Michael Perloff  
Michael Perloff