

**I, [REDACTED], make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C § 1746 that the following is true and correct:**

1. My name is [REDACTED]. I am the mother of [REDACTED], who is incarcerated in the Bureau of Prisons. I am submitting this declaration in support of my daughter's request for relief.
2. [REDACTED] was born on [REDACTED]. She is my only child. Her original name was [REDACTED]. From a young age, I remember noticing things about [REDACTED] that didn't quite match what I saw among her peers. It wasn't anything dramatic—just little things, like the way [REDACTED] seemed to gravitate toward dolls or how she carried herself or dressed in ways that felt unique compared to other kids. At the time, I didn't think too much of it—I just figured she was her own unique person, a bit outside the mold. In middle school, she initially shared with me that she thought she was gay but soon came back to tell me that she felt like a girl, thought she was a girl, and believed herself to be transgender. I told her I loved her, of course. I also wanted to be sure that she and our family had the medical and mental health support to be able to provide her the support she needed. That began a process of reaching out to medical and mental health providers.
3. Working with therapists and doctors, we learned that [REDACTED] had gender dysphoria. Based on professional recommendations and with the support of her providers, [REDACTED] stopped using her male birth name, began using female

pronouns, and living as a girl. Students at her high school who had known her throughout her life knew that she was a transgender girl, so she encountered some initial hostility, but—especially with her core group of friends—she was eventually embraced and accepted as a young woman.

4. [REDACTED] was largely succeeding academically, but for a range of reasons relating to her experience and family history she was [REDACTED]  
[REDACTED]  
[REDACTED]. By her sophomore year in high school, [REDACTED], our family found a doctor for [REDACTED] who specialized in providing healthcare to transgender young adults. Under his care, she initiated hormone replacement therapy to bring her body into alignment with typical female ranges. I have seen over the years the impact of the hormone therapy on her. She has a female body, soft facial features, hips, and breasts.
5. The same doctor who provided her with transgender health care also treated [REDACTED] that she has had since she was [REDACTED]. The doctor ensured that the prescribed hormones worked in conjunction with the [REDACTED] medicine that she took.
6. In [REDACTED] grade, [REDACTED] joined the cheerleading squad and continued in school, ultimately graduating in June [REDACTED]. She finished her degree in the school's home

instruction program. After graduation, she worked part time until her arrest in [REDACTED].

7. After [REDACTED]'s arraignment, she was housed in a federal detention facility in [REDACTED]. While she was there, we spoke several times per week. [REDACTED] was initially housed in an individual unit but soon thereafter was housed exclusively with women. While [REDACTED] was at [REDACTED], she continued to receive hormone therapy. She also continued to receive [REDACTED] medication.

8. After [REDACTED] was sentenced, she was sent to [REDACTED]. In her approximately [REDACTED], a women's prison, [REDACTED] continued to receive the hormones she was prescribed to treat her gender dysphoria as well as the [REDACTED] medication. She was housed exclusively with women. During this time, we continued to speak several times per week. [REDACTED]'s period of incarceration at [REDACTED] was generally unremarkable; with the exception of one infraction for [REDACTED], I am not aware of any other disciplinary charges against [REDACTED] while she was there.

9. In [REDACTED], [REDACTED] was transferred to [REDACTED]. That prison is also a women's prison. Until this week, she has been housed in general population. Other than [REDACTED], she has stayed out of trouble. At this facility, [REDACTED] has been involved

with a program where [REDACTED]  
[REDACTED]  
[REDACTED] is a women's prison, the commissary provides things like makeup, female undergarments, and other items needed by the women housed there.

10. I have been able to speak to [REDACTED] during her time at [REDACTED]. She keeps me updated on her life and her medical care. [REDACTED]  
[REDACTED]  
[REDACTED]. While at [REDACTED], [REDACTED] has continued to received hormones and [REDACTED] medication, as far as I know, both of which she has been taking for many, many years.

11. On Tuesday, January 21, 2025, I received a call from [REDACTED]. She was frantic. Through tears, she told me that she and [REDACTED] were being segregated from the rest of the prison. She was told that they were being housed in the Special Housing Unit ("SHU") and then would be sent to a transfer facility and, ultimately, to a men's prison. Later that day she called me back to say that she [REDACTED] had been told that because of an Executive Order signed by the President, they were being transferred to a men's prison.

12. Until that transferred occurred, she was told, they would be held in the SHU.

Because people held in the SHU do not have access to the telephone, she would not be able to speak with me again until she had been transferred. She did not have any ability to contest her placement in the SHU before being sent there, or since. Similarly, she was told that did not have an ability to challenge the transfer because it was required by Executive Order. Although she was told that transfer to a new facility would happen soon, and that transfer to the SHU would be immediate, [REDACTED] was not told when, exactly, she would be transferred. I have not had any contact with [REDACTED] since Tuesday.

13. [REDACTED] is my daughter. For more than a decade, she has lived as a woman. For the [REDACTED] years during which she has been incarcerated, she has only been housed with women. [REDACTED]  
[REDACTED] and being housed with women is the only way she can remain safe.

14. When your child is incarcerated, you worry about them. If [REDACTED] were transferred to a men's prison, my fears would multiply. As a mother, I am terrified for my daughter's safety and well-being if she is placed in a men's prison. My biggest fear is that she will be targeted for harassment, abuse, and violence, including rape, because she is transgender. I know how vulnerable she

would be in that environment, surrounded by people who would see her as an easy target for violence.

15. I worry that she will get assaulted in a men's prison. Given her previous bouts with [REDACTED] [REDACTED].

16. If [REDACTED] were forced to stop taking hormones, it would throw her body into shock. She has been taking the medications for so long that the changes they produce in her body have become a part of her. Without the medicine, [REDACTED] [REDACTED], and I fear for her safety.

Executed on the 25th day of January in the year of 2025.

Signature:

Date: 1/25/2025

[REDACTED]