

# EXHIBIT 6

**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 have faced explicit retaliation for the declaration that I submitted in support of the Plaintiffs' Status Report in this case.
2. On January 20, 2026, at around 11:30am, I was summoned to the Lieutenant's office by SIS Lieutenant Quinn and Captain Hock. They said they wanted to talk to me about my declaration that I submitted with the status report. They asked if there was anything that they could do to get my signature on a document that had the Kingdom case header and said "Notice of Withdrawal." The document said something to the effect of "I, Jeremy Pinson, hereby withdraw any previously filed declarations in this case." I had no desire to withdraw my declarations, and had never told anyone that I did.
3. They said that I should sign the document because PREA policy 115.62 requires the separation of victims and abusers, so if I signed the document, there would be no need to separate me from Captain Hock, but if I didn't, they would move me to the Special Housing Unit (SHU) of another institution because that was what the policy called for. I told them it sounded like they were threatening to transfer me to the SHU of another institution if I didn't sign. They said they weren't threatening me, but if that's how I took it, then that's how I took it. They said they were there to solve a problem, and how I could solve the problem is by signing the paper. I did not sign the paper, and they let me leave.
4. At around 3:30pm that day, I was called back to the Lieutenant's office. My case manager Privette said that I was going to be sent to the Secure Mental Health Unit (SMHU), which

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

is used for disciplinary purposes as well. I asked why I was being sent there, because I do not have a severe mental health need. He lowered his voice very low and said words to the effect of, “they’re locking you up. I want you to stay calm and not flip out and make things worse. I don’t have any power to do anything but what the captain says, so I have to escort you and your cellmate to the annex.” I asked why my cellmate, Elmer Moreno, was being sent to the SMHU, and my case manager handed me an incident report claiming that my cellmate and I had been kissing the night before, which was completely false. I told him that, and he said words to the effect of, “if you put yourself in the position of making people mad, you have to be able to roll with the punches.” He then said words to the effect of, “I want you to know that I know this isn’t right, I’m taking you up there so they don’t do anything to you. They might hurt you if you resist and I don’t want them to hurt you.”

5. Elmer and I were taken to the SMHU. They put us in a shower, had male staff strip us naked, and left us there for at least fifteen minutes. We were then put in separate cells. The cell is freezing cold. There are holes in the windows that go to the outdoors, and there was snow on the ground outside when I arrived at the SMHU.
6. Last week, on Monday, February 2<sup>nd</sup>, Lieutenant Weldon came to my cell and said that he needed to speak to me. He showed me an incident report filed against me by Officer Nelson, accusing me of lying to staff and insolence, saying that a PREA report I had filed against Officer was false, and that when she tried to speak to me about the complaint, I yelled at her and called her a lying bitch. That was completely false; I had never spoken to her after I filed the PREA complaint against her. Lieutenant Weldon said he knew that she was lying, and that he was going to shred the incident report, but that I needed to be very careful. He said there was a culture in BOP of retaliation against anyone who doesn’t follow the “company line.” He said he wouldn’t put his name on a paper framing me.
7. On Friday Morning, February 6<sup>th</sup>, at about 9am, Lieutenant Markle and Lieutenant Quinones came and presented me with a new incident report by Officer Nelson, saying that I had covered the camera in my cell, and when she told me to uncover it, that I told her, “go fuck yourself.” Once again, that was completely false. Lieutenant Markle said that they know it’s false and that it’s retaliation for filing the PREA complaint, and that Officer Nelson is working with the Captain to get me shipped out by making false allegations. Lieutenant Markle said she’d be the first one to testify on my behalf at a disciplinary hearing about the incident report. I asked what the camera footage showed from the time Officer Nelson was accusing me of, and they said the camera was “malfunctioning” at the time and so footage was not available.
8. My pat search exemption card was taken away from me when I was sent to the SMHU. Officer Corey demanded it when I was brought into the unit, and threatened to pepper spray me if I didn’t hand it over. They said I couldn’t have the card in my cell because it is laminated, and I can’t have anything “hard” in my cell. I have been searched at least

two dozen times by male officers since getting to the SMHU. They make me lift my genitalia, bend over, and spread my buttocks so that they can see inside my rectum. It is incredibly degrading and humiliating every time.

9. When I was last in general population, there was no transgender commissary list. Officer Parker, the commissary officer, told me there was no transgender commissary or SPO list, or any document that would let me buy makeup or women's hygiene items. I also asked Mr. Salley, the Trust Fund Supervisor, and he told me the same.

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

Dated: 02/11/2026

/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 02/11/2026.

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

Dated: 02/11/2026

/s/ Megan Noor  
Megan Noor