

**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.¹ 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 a 40-year-old transgender woman in the custody of the Federal Bureau of Prisons. I am currently incarcerated at FCI Butner Medium I.
2. BOP staff are continuing to retaliate against me for the declarations that I have submitted in this case.
3. I am still being housed in the Secure Mental Health Unit (SMHU) at FCI Butner. I saw a hearing officer on Friday, February 20, and he found me not guilty of the charges that I was housed here for, and I was supposed to be sent back to General Population on Monday, February 23.
4. On Friday morning, February 20, Dr. Lawrence Sichel, the Medical Director at FCI Butner, came to my cell and said that he had come to give me a copy of a new BOP policy about treatment of gender dysphoria. He said that I would not receive the next injection of my estrogen, which is scheduled within about ten days from now. He also said that he had no choice but to order the pharmacy to stop giving me my twice-daily spironolactone. He said he didn't have the choice to titrate me down, and that this could put me at risk of a heart attack, stroke, or pulmonary embolism. He told me he had been directed by Central Office to come just to my cell immediately and give me a copy of the policy and to terminate my hormone therapy immediately, but that they were working on treatment plans for all of the other transgender people at the facility. He told me he was afraid he would lose his job if he didn't do this.
5. On Sunday, February 22nd at around 6:30am, Lieutenant B. Teague, along with Lieutenant Cobb and Officers Terry, Estrada, and Holloman woke me up demanding that I put my hands through the tray slot in the door of my cell to be handcuffed. I was

¹ My legal name is Jeremy Pinson. My Federal Bureau of Prisons register number is 16267-064.

confused because I had just woken up. When I asked what was happening, Lt. Teague said, “cuff the fuck up, if you don’t cuff up, I’m going to pepper spray you.” My cellmate and I quickly put our hands through the slot and they put the handcuffs on us. They then escorted me and my cellmate to separate stalls in a shower area and made us strip completely naked. I tried to tell them that I had a female-only pat and visual search exemption, but Lt. Teague said he didn’t “give a fuck.” Lt. Teague, Lt. Cobb, and Officers Terry and Estrada, all male staff members, ordered me to show them my breasts, lift my genitalia, and bend over, spread my rectum, and cough. They kept telling me to spread them “wider!” I started crying from the humiliation. They screamed at me to spread my butt cheeks “wider!” about five times, even when I couldn’t do any more. Lt. Teague said he was going to “show [me] who’s boss.” After that, they left me, naked and crying, in a freezing cold shower area for about thirty minutes. Other people in the SMHU told me they saw staff reading through my legal papers in my cell during that time, like they were looking for something specific.

6. After that, I was taken to a new cell in the SMHU. Before I got in, Lt. Teague stopped me in front of the cell and said, “I’ve told you before, and I’ll tell you again, I don’t give a fuck what that judge says, I do what I want.” I understood him to be referring to Judge Lamberth in this case. He then said, “you only have a little bit of time left in here. If you want to make it home alive, you need to stop sending stuff to that fucking judge, or you’re not going to make it.” He slammed my door closed at the end of that sentence.
7. The cell has someone else’s feces and urine all over it. The officers threw all of my possessions all over the cell. I had to throw away some of my papers because they got feces on them.
8. On Monday, February 23, when I was supposed to be released from the SMHU, Lt. Teague stopped me as I was walking back to my cell from the showers and told me, “I told you I was going to get you.” Lt. Cobb then came to my cell and handed me an incident report written by Lt. Teague, charging me with possessing drugs and misusing authorized medication. My cellmate eventually told me that the substance they had found in the cell was his. I honestly had no idea he’d had it. He wrote a written statement for Lt. Teague and Lt. Cobb saying this, and that I had no knowledge about it. Despite my cellmate’s confession, because I was charged with this serious accusation, they will keep me in the SMHU until the next time the hearing officer comes, which is often at least a month. When I complained that I was obviously innocent to Lt. Cobb, he lowered his voice and told me to stay calm, that the others are hoping I will act out so that they can hurt me.
9. Shortly after that, I heard Lt. Teague stop and speak to my former cellmate, Elmer Moreno, who is housed a few cells away from me in the SMHU. Elmer asked why he is still being housed in the SMHU because he has no charges pending anymore. Lt. Teague said, “have you been talking to her lawyers?” Elmer asked who he meant, and Lt. Teague said, “Pinson.” Elmer confirmed that he had, and Lt. Teague said, “that’s why you’re still

back here. You're not getting out today." Elmer said that he didn't have any charges for them to keep him, and Lt. Teague said, "you don't have any charges *yet*," and walked away.

10. Despite these threats, and despite being afraid that the staff at FCI Butner will hurt me like they have threatened, I am still submitting this additional declaration. I think that it is important for the Court to know what is happening here.

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

Dated: 02/24/2026

/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 02/24/2026.

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

Dated: 02/24/2026

/s/ Megan Noor
Megan Noor