

**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 ELMER  
ARMANDO MORENO**

My name is Elmer Armando Moreno.<sup>1</sup> 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 34-year-old man in the custody of the Federal Bureau of Prisons. I am currently incarcerated at FCI Butner Medium I (Butner).
2. I've known Grace Pinson (Grace) for almost three years. We were cellmates in the SHU in Tucson USP.
3. I was transferred to Butner about almost a year ago.
4. I have been Grace Pinson's cell mate in General Population since I arrived at Butner.
5. On or around January 20, 2026 around midday Grace was taken from our cell. When she returned, I asked her what happened. She told me SIS Quinn and Captain Hock threatened to ship and lock her up at another facility if she didn't retract her statements made in this case, *Kingdom v. Trump*. I tried to calm her down, but she kept saying "I can't believe these people!"
6. That same day around 3:30pm Unit Manager Privette took both Grace and I to the Lieutenants' office. While we were walking to the office, Unit Manager Privette said to us, "you play with powerful people, they can hurt you. You're both getting a shot," or words to similar effect. (A "shot" is an incident report with a disciplinary charge.) Once we got to the Lieutenants' office we were each given an incident report alleging a 205—a disciplinary charge based on the false allegation that we—Grace and I— were kissing the night before around midnight. It was signed by Officer Neil.
7. When I read it, I said "this is crazy" because it was a lie.
8. The night before we had gone to bed around 9 or 10pm when we usually do.
9. Privette and two other compound officers put us in handcuffs and took us the Secure Mental Health Unit (SMHU).

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<sup>1</sup> My BOP registration number is #93653-280.

10. Officer Corey ordered Grace to turn over her pat search exemption card. I told them that wasn't right. Grace refused. Officer Corey then threatened pepper spray her if she did not.
11. Then they put us in the showers and strip searched us.
12. In the SMHU, BOP officers initially put me in a cell across from Grace at an angle where Grace and I could speak more easily. When they heard us discussing the ways BOP staff were retaliating against us for Grace's advocacy, they moved me to the furthest cell from Grace. This cell had a crack in the window and it was awfully cold. I could see my breath in the cell.
13. About a week later they moved me to another cell and accused me of breaking the window. When I corrected them that I had not broken the window Captain Hock threatened to beat me half to death and ship me to another facility saying "because I can and there's nothing you can do about it."
14. We have none of our property here in the SMHU.
15. From where I am housed now in the SMHU, I can still hear Grace when she raises her voice. Sometime while housed in this cell, I overheard a conversation between her and a BOP staff member where I heard Grace say "that's not right! I didn't threaten anyone!" Grace was clearly upset.
16. I have witnessed BOP staff antagonize Grace on many occasions. She usually responds by telling them to leave her alone and that she'll see them in court. BOP staff frequently respond with threats of bodily harm or punishment.
17. We have not seen the hearing officer, Officer Myrick, for the false incident reports against us, which is the alleged reason for us being in the SMHU. I spoke with him last Wednesday while Grace was on a legal call, but the case has not been decided yet. We were told by BOP staff that we would have to wait until this week for Grace to speak with him. We have not seen him and have no idea when we will.
18. I have been incarcerated for 15 years, received many shots during that time, and have never had to wait so long—nearly a month—to see a hearing officer for an incident report before. I believe this is being done to us in retaliation for Grace's advocacy. Because of what I have witnessed BOP staff do to Grace, I fear for my own safety.

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

Dated: 2/19/2026

/s/ Elmer Armando Moreno  
Elmer Armando Moreno

I, Dale Melchert, certify that I have read the foregoing to Elmer Armando Moreno, and that he affirmed that the foregoing is true and correct on February 19, 2026.

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

Dated: February 19, 2026

/s/ Dale Melchert

Dale Melchert