

**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 SOLO NICHOLS**

My name is Solo Nichols.<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 40-year-old transgender man in the custody of the Federal Bureau of Prisons (“BOP”). I am currently incarcerated at Federal Correctional Institution (“FCI”) Tallahassee.

2. Growing up in Michigan, even at a young age I knew I was a boy. I would tell people, “Don’t call me a girl. I’m a boy.” I was in fifth grade the first time I confidently told a friend that I was a boy.

3. As I grew, my gender dysphoria started causing depression and anxiety. I felt invisible, small, inadequate, mentally and physically weak. It was the worst when I would get my period. I felt exposed, and I felt like a fraud. Walking to the bathroom with a tampon, I would sweat and my heart would race. It felt like being naked in public.

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<sup>1</sup> My legal name is Latasha Ann Nichols. My Federal Bureau of Prisons Register Number is 16212-040.

4. Starting around age 15, I began what I now understand to be called “social transition.” I wore exclusively men’s clothes and used men’s hygiene products. I also started wearing a chest binder to give my chest a more masculine appearance.

5. I have been in federal prison since 2013. My current release date is August 28, 2029.

6. Though I had known myself to be a man for a long time, it was in federal prison that I first heard the word “transgender.” Around 2016, I learned that if BOP recognized me as transgender, I could access boxers, chest binders, and men’s hygiene products—just as I had before coming to prison. It took BOP about two years to recognize me as transgender, and I was allowed access to these items in 2018.

7. A BOP healthcare provider diagnosed me with gender dysphoria in 2021, and I started testosterone hormone therapy around June 2021.

8. Being on testosterone has made me feel “normal” for the first time in my life. From ages 14 to 36 I was prescribed approximately 13 different psychiatric medications. Since starting testosterone, I have not had a need for any psychiatric medications. Other medications never controlled my anxiety or agitation. Before starting testosterone, I experienced constant racing thoughts, and I could not control my temper. Since starting testosterone, I feel “grounded” and in control of myself in a way I never did before. Testosterone has enabled me, for the first time in my life, to handle difficult situations in a measured way, and to take constructive criticisms not as attacks, but as opportunities to learn and grow. Testosterone has also stopped my period.

9. In 2022, BOP medical providers approved me for “top surgery”—a double mastectomy to further treat my gender dysphoria. That approval was the result of a long process

that included a chest x-ray, a mammogram, answering about 200 questions for a clinical director, a video conference with the Transgender Utilization Review Advisory Group. The TURAG and the BOP medical director approved me for surgery. I have been waiting for a consultation with a surgeon ever since.

10. Ever since President Trump issued the Executive Order, I have been living in fear that BOP will take away the medication that allows me to live as my true self.

11. The week of January 27, BOP psychologist Dr. Proulx informed me that she was aware of an email from officials at a BOP central office in Grand Prairie, TX directing BOP medical staff to discontinue hormone therapy at FCI Tallahassee. She apologized and said that this was not the decision she would make. However, I later spoke with Warden Pistro, and she told me that nothing was changing yet.

12. That same week, Dr. Proulx posted a message on an inmate bulletin board that included information about the effects of discontinuing testosterone hormone therapy. That message read, in part, “apart from endocrine problems, discontinuation of high-dose, long-term TRT can also lead to testosterone withdrawal symptoms, such as depression, uncontrollable desire to get back on T, sleep problems and insomnia, lack of energy and fatigue, lack of appetite, anorexia, decreased libido, muscle and joint pain, and headaches.”

13. Prior to February 12, 2025, I received a 100mg testosterone injection every other week. It is my understanding that 100mg is a lower dose than other transgender men require. It is my understanding that 100mg is effective for me because I previously underwent a partial hysterectomy. My injections are ordinarily administered by Nurse Practitioner Nelson.

14. On February 12, 2025, when I arrived to receive my regularly scheduled injection a new staff person, Mr. Goodman, was there to administer testosterone injections for me and

three other transgender men. We were all surprised to learn that our doses were reduced that day. Instead of 100mg, I received only 50mg. Mr. Goodman told me that on February 26, 2025, I would receive a 25mg injection and that that would be my last testosterone injection. Mr. Goodman said that this was happening because of President Trump's Executive Order.

15. I received no prior notice that my testosterone dosage would be reduced or discontinued. I have not had any recent lab work done, and no medical or mental health provider spoke to me about my course of treatment and what a reduction or discontinuation of my testosterone hormone therapy would mean for me individually.

16. After receiving my reduced dose on February 12, I experienced fatigue and mood swings. It feels like the other transgender men and I were walking around like zombies.

17. On Friday, February 21, 2025, the other transgender men and I were informed that our testosterone treatments would be restored to our full dosages. The staff said this would only last until "the restraining order is up."

18. I am very scared to live without testosterone hormone therapy. It feels like who I am and all of the progress I've made is being taken from me, and I feel extremely anxious. I fear losing muscle mass, I am scared to get my period again, and I worry what other detrimental physical and mental health effects I will experience.

19. The last week of February, BOP staff informed me that they would no longer provide, and I would no longer be able to purchase, boxers or chest binders.

20. I have filed BP-8, BP-9, and BP-10 grievances about the changes to our access to care for gender dysphoria.

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

Dated: 03/05/2025

/s/ Solo Nichols  
Solo Nichols

I, Shawn Thomas Meerkamper, certify that I have read the foregoing to Solo Nichols, and that he affirmed that the foregoing is true and correct on 03/05/2025.

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

Dated: 03/13/2025

/s/ Shawn Thomas Meerkamper  
Shawn Thomas Meerkamper