

**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

**SUPPLEMENTAL DECLARATION
OF SOLO NICHOLS**

My name is Solo Nichols.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. When my hormone dosage was reduced without notice on February 12, 2025, all other transgender men at FCI Tallahassee who had been on hormone therapy also had their hormone dosages reduced at the same time. None of us met with a doctor or had an evaluation beforehand.

2. I informed FCI Tallahassee staff about a temporary restraining order in *Doe v. McHenry* the week of February 16, 2025.

3. On February 21, 2025, when my hormone dosage was restored, all other transgender men whose dosages had been reduced also had theirs restored at the same time.

4. I did meet with a doctor before my hormone dosage was restored. However, that doctor did not examine me, order lab work, or discuss my mental health with me. He simply

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

confirmed that I wanted my dose restored and confirmed what my previous dosage was. He reviewed two-year-old blood work with me after I requested an increased dosage. This meeting, and the other transgender men's meetings with the same doctor, lasted between 2 and 5 minutes.

5. As I mentioned in my first declaration, the last week of February 2025, BOP staff informed me that they would no longer provide, and I would no longer be able to purchase, boxers or chest binders. When the boxers I currently have are no longer wearable, panties will be the only option I have for underwear.

6. Wearing boxers makes me feel normal. The thought of wearing panties when I run out of boxers makes me deeply uncomfortable, like I can't breathe. I would feel inadequate and embarrassed. Because of the ways in which hormone therapy has changed my body, wearing panties would be physically irritating in addition to mentally degrading. My gender dysphoria would be significantly worse.

7. It is my understanding that the transgender men in the Special Housing Unit FCI Tallahassee currently are only allowed to wear panties.

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

Dated: 04/01/2025

/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 04/01/2025.

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

Dated: 04/01/2025

/s/ Shawn Thomas Meerkamper
Shawn Thomas Meerkamper