

**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

**THIRD 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 41-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. As I mentioned in my previous declarations, I have been on testosterone hormone therapy since around June 2021.

3. In my previous declarations, I described how FCI Tallahassee briefly reduced my testosterone dosage—as it did with all other transgender men here—in February 2025. In addition to that incident, I was cut off my hormones from mid-November 2025 to Mid-February 2026. I experienced extreme hot flashes, from the top of my head to the tips of my toes. I could not sleep and had rapid mood swings. Everyday challenges made me unreasonably sad and

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

tearful. I was extremely irritated by small inconveniences, and living with my roommate felt much more difficult than it should.

4. I therefore know how it would feel to be tapered off or removed from hormone therapy, as would be required by BOP's new Program Statement 5260.01. Even if I were allowed to remain on my hormones at first, if I was "reevaluated regularly with respect to cessation of hormones," I would feel constant dread. I would dread waking up each morning.

5. Program Statement 5260.01 says that BOP plans to treat us with psychotherapy and psychotropic medications instead of hormone therapy. But, as I explained in my first declaration, from ages 14 to 36 I was prescribed approximately 13 different psychiatric medications, and I have not had a need for any psychiatric medications since starting testosterone hormone therapy. I have also been treated with psychotherapy for at least seven years of my life. Having tried so many different mental health treatments, I know unequivocally that testosterone is what works for me. Testosterone has fixed what so many other medications failed to. That's because I am a man who has gender dysphoria. Testosterone is the treatment I need.

6. Program Statement 5260.01 would also deprive me of men's body wash, deodorant, boxers, and chest binders and force me to wear panties and bras. I am a man. Like a lot of men, being forced to wear panties or bras would be an incredibly degrading experience. I know that being subjected to this treatment would make me suicidal.

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

Dated: 04/16/2026

/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 04/16/2026.

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

Dated: 04/16/2026

/s/ Shawn Thomas Meerkamper  
Shawn Thomas Meerkamper