

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SUNDAY HINTON, on behalf of herself and
others similarly situated,

Plaintiff,

v.

DISTRICT OF COLUMBIA,

Defendant.

No. 21-cv-1295 (JDB)

SUPPLEMENTAL DECLARATION OF SUNDAY HINTON

I, Sunday Hinton, declare as follows:

1. I am over 18 years of age and a resident of the District of Columbia. I make this declaration based on my personal knowledge of the matters described.

2. On Monday, May 10, 2021, I finished my 14-day quarantine. I was quarantined on a men's unit in the Central Detention Facility (CDF), otherwise known as the D.C. Jail. CDF only houses men. Forty or more men were on the unit with me. The quarantine unit was not solitary confinement. I was allowed outside of my cell around other residents and staff, both inside my unit and outside my unit.

3. I chose not to come out of my cell as much as possible. It has been scary to be the only girl on the unit. I even took my wig off and everything because I didn't feel comfortable. The men would yell, "why don't you wear your wig!" and other things, but I was not going to sit there and give those boys a show. I'm not trying to get attention, so I didn't even come out of my cell.

4. On May 12, 2021, Ms. Reid, Ms. Outlaw, the Chief CMP, and Lt. Moore from over at CTF met with me about my housing and other concerns. The meeting took place in a

conference room at the D.C. Jail (CDF). I believe it was in the Chief CMP's office. When I got to the meeting, they asked me what my concerns were about my housing. I expressed that I wanted to be housed with the women at the Central Treatment Facility (CTF). I explained to them in detail why I wanted to go to a women's unit.

6. The response I got during the meeting to my request to go to a women's unit was the same response as I had gotten before, and Ms. Outlaw said the same thing she has been saying: that I could get sexually assaulted if I went into the women's unit. I was trying to explain to her: "you're putting me in an even more volatile situation by putting me in the men's unit." I told the group that I could handle the women if a situation like that came up, but that I had a much better chance of being able to handle the women than I did handling a man trying to pressure me into giving him oral sex or doing something else I didn't want to do.

7. When they saw it from my point of view, their reaction was more like, "okay, we understand. But we're still not going to put you in a women's unit." Once it was clear they weren't going to put me in a women's unit, I asked them: if they wouldn't let me be with the women, would they put me at CTF with a friend of mine who is transgender? I explained that it's scary to be the only girl on the unit. I didn't want to be on the men's unit, but it's a better situation than being the only girl on the unit.

8. Basically, in a nutshell, I was told, "okay, you're going over here to CTF to be with your friend. We're not putting you on the female unit, but you get to come over here with another transgender woman." They told me, "we're going to make that happen for you, but you need to sign a waiver."

9. They had me sign a waiver saying I wanted to be housed with the men. When Ms. Reid tried to give me the paper to sign, I told her: "I think it's probably best that my lawyer be here because I don't understand." I had just told them I wanted to be housed with the women. I

told them I thought my lawyer should be there so I knew what the paper stated. It would have been best for my lawyer to be there so that my needs could be met and I could understand what was going on. But that was not an option. They were essentially saying: you have to sign this to go be with your friend, but if you don't, you have to stay here at the Jail (CDF). So I signed the paper because I thought it would be a little safer to have another girl on the unit with me than to stay with all men at the Jail.

I, Rachel Cicurel, certify that all of the statements above I transcribed as accurately as I could when they were made to me by Sunday Hinton on a telephone call at between 4:59 pm and 5:45 pm Eastern time on May 12, 2021, and she stated to me that the foregoing was true and correct.

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

Executed in Washington, D.C. on May 13, 2021.

Handwritten signature of Rachel Cicurel in cursive script.

Rachel Cicurel