

United States District Court  
Eastern District of California

**FILED**

DEC 11 2013

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY [Signature] DEPUTY CLERK

Case No. 13-CV-1821-MJS-PC

Jeremy Pinson,  
Mikal Stine,  
Jeremy Brown,  
Plaintiffs,  
v.  
Federal Bureau of Prisons,  
John Doe No. 1 - SIA,  
Defendants,

AMENDED COMPLAINT

**RECEIVED**

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I. Jurisdiction:

1. Jurisdiction is asserted pursuant to 28 USC 1331-32, and Bivens, 403 U.S. 388 (1971).

II. Cause of Action:

- 1. Violation of the Eighth Amendment (Claim One).
- 2. Violation of the First Amendment (Claim Two).
- 3. Violation of Privacy Act 5 U.S.C. 552a. (Claim Three)

III. Supporting Facts:

- 1. Plaintiffs are inmates in the custody of the BOP.
- 2. In 2010 Plaintiffs initiated a lawsuit against many high ranking officials of the BOP in D.C. Circuit Case No. 10-5059.

3. One party to the case was inmate Matthew Eyre who was later transferred to U.S.P. Atwater, CA.
4. Defendant BOP operates U.S.P. Atwater and employs defendant Doe as the SIA of USP Atwater responsible for investigations and intelligence.
5. Plaintiffs Stine and Brown are former members of the Aryan Brotherhood.
6. Plaintiff Pinson is a former member of Florencia 13 a street gang subordinate to the Mexican Mafia.
7. Pinson and Stine both cooperated with law enforcement via debriefing and testimony against the 2 gangs.
8. On or about 7-30-2012 defendant Doe spoke to inmate Eyre to question him about the pending lawsuit and told him he should cease participation and told him Pinson, Stine, Brown were "notorious onitches" and revealed sensitive information about them from BOP files.
9. Inmate Eyre was also told that several Sureno and skinhead gang members would soon know he was "collaborating with rats".
10. As a result of the disclosures by defendant Doe, Sureno gang members communicated via U.S. Mail details to the Mexican Mafia which authorized all Sureno gangmembers in BOP facilities to kill the Plaintiffs and solicited other gangs to do the same

11. Shortly thereafter Pinson and Stine were assaulted and sustained minor injuries.
12. Pinson, Stine and Brown all three are housed with violent gangmembers who are armed with shanks and whom have vowed to kill plaintiffs.
13. Defendant BOP refuses to investigate defendant Doc's actions or to take steps to protect the plaintiffs from the gangs that have vowed to kill plaintiffs.
14. Numerous inmates have recently been murdered or seriously injured by the same gangmembers now threatening to kill Plaintiffs.

#### IV. Requested Relief:

1. Compensatory and Punitive Damages - \$100,000.00
2. Injunction compelling defendant BOP to relocate plaintiffs to a medium security or state prison for their protection.

Executed pursuant to 28 U.S.C. 1746 under penalty of perjury.

Jeremy Pinson

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Mikeal Stine

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Jeremy Brown

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Certificate of Service

This pleading was served on Defendant BOP at its Stockton regional office via U.S. Mails by the above-signed.