

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO

MAR 20 2026

JEFFREY P. COLWELL
CLERK

Civil Action No. 25-CV-03350-RTG
(To be supplied by the court)

Yvonne Peterson, Plaintiff

v.

Benjamin Thiel,

Jury Trial requested:
(please check one)

☒ Yes ☐ No

_____, Defendant(s).

(List each named defendant on a separate line. If you cannot fit the names of all defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section B. Do not include addresses here.)

PRISONER COMPLAINT

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievances, witness statements, or any other materials to the Clerk's Office with this complaint.

A. PLAINTIFF INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

Yvonne Peterson, 185680, P.O. Box 392005, Denver, CO, 80239
(Name, prisoner identification number, and complete mailing address)

(Other names by which you have been known)

Indicate whether you are a prisoner or other confined person as follows: (check one)

- ____ Pretrial detainee
____ Civilly committed detainee
____ Immigration detainee
☒ Convicted and sentenced state prisoner
____ Convicted and sentenced federal prisoner
____ Other: (Please explain) _____

B. DEFENDANT(S) INFORMATION

Please list the following information for each defendant listed in the caption of the complaint. If more space is needed, use extra paper to provide the information requested. The additional pages regarding defendants should be labeled "B. DEFENDANT(S) INFORMATION."

Defendant 1: Benjamin Thiel, Programs Coordinator, 1401 W. 17th Street,
(Name, job title, and complete mailing address)

Pueblo, CO, 81003,

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ___ No (check one). Briefly explain:

He is the programs coordinator, he works
at the La-Vista Facility

Defendant 1 is being sued in his/her ☒ individual and/or ___ official capacity.

Defendant 2: _____
(Name, job title, and complete mailing address)

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ____ Yes ____ No (*check one*). Briefly explain:

Defendant 2 is being sued in his/her ____ individual and/or ____ official capacity.

Defendant 3: _____
(Name, job title, and complete mailing address)

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ____ Yes ____ No (*check one*). Briefly explain:

Defendant 3 is being sued in his/her ____ individual and/or ____ official capacity.

C. JURISDICTION

Indicate the federal legal basis for your claim(s): (*check all that apply*)

☒ State/Local Official (42 U.S.C. § 1983)

☐ Federal Official

As to the federal official, are you seeking:

☐ Money damages pursuant to *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971)

☐ Declaratory/Injunctive relief pursuant to 28 U.S.C. § 1331, 28 U.S.C. § 1361, or 28 U.S.C. § 2201

☐ Other: (*please identify*) _____

D. STATEMENT OF CLAIM(S)

State clearly and concisely every claim that you are asserting in this action. For each claim, specify the right that allegedly has been violated and state all facts that support your claim, including the date(s) on which the incident(s) occurred, the name(s) of the specific person(s) involved in each claim, and the specific facts that show how each person was involved in each claim. You do not need to cite specific legal cases to support your claim(s). If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "D. STATEMENT OF CLAIMS."

CLAIM ONE: Free exercise of Religion Violation + Retaliation For
GRIEVING.
Claim one is asserted against these Defendant(s): Benjamin Thiel, programs
coordinator

Supporting facts:

Benjamin Thiel Is the Programs Coordinator at La-Vista Correctional facility, He Is In Control of Scheduling And Allowing The Sweat lodge Religious Services, And He Keeps All the Ceremonial Objects In his office. When Thiel Denied A Sweat Ceremony And Refused to bring Our "Materials," It Was Solely due to him Not Wanting to, In Order to be Malicious, And According to Thiel, We had enough Sage And tobacco To last Until the Springtime. Thiel let Us Have An oz of Tobacco A Week And We Never Used it All at Once. Please See Attached pages. my religious rights have been violated by Thiel. I Demand punitive, or

E. PREVIOUS LAWSUITS

Have you ever filed a lawsuit, other than this lawsuit, in any federal or state court while you were incarcerated? ☒ Yes ___ No (check one).

If your answer is "Yes," complete this section of the form. If you have filed more than one previous lawsuit, use additional paper to provide the requested information for each previous lawsuit. Please indicate that additional paper is attached and label the additional pages regarding previous lawsuits as "E. PREVIOUS LAWSUITS."

Name(s) of defendant(s):

Jessie Howard, Shawna Chase

Docket number and court:

22-CV-D1922

Claims raised:

medical Deliberate Indifference

Disposition: (is the case still pending?
has it been dismissed?; was relief granted?)

Pending

Reasons for dismissal, if dismissed:

—

Result on appeal, if appealed:

—

F. ADMINISTRATIVE REMEDIES

WARNING: Prisoners must exhaust administrative remedies before filing an action in federal court regarding prison conditions. See 42 U.S.C. § 1997e(a). Your case may be dismissed or judgment entered against you if you have not exhausted administrative remedies.

Is there a formal grievance procedure at the institution in which you are confined?

☒ Yes ___ No (check one)

Did you exhaust administrative remedies?

☒ Yes ___ No (check one)

G. REQUEST FOR RELIEF

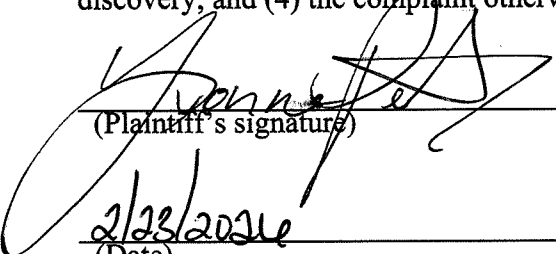
State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "G. REQUEST FOR RELIEF."

Punitive or Nominal Damages In An Amount Deemed Necessary by The Court, Plus Cost of Personal Fault Property and 410.00 They took to File the Case. (One Sum For Three months of Denying me Reasonable opportunity to practice my religion and For Retaliation For Filing grievances For those Religious Freedom Violations)

H. PLAINTIFF'S SIGNATURE

I declare under penalty of perjury that I am the plaintiff in this action, that I have read this complaint, and that the information in this complaint is true and correct. See 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


(Plaintiff's signature)

2/23/2026
(Date)

Colorado Department of Corrections

Name: Wayne Peterson
Register Number: 188480
Unit: 2
Box Number: P-Box 34405
City, State, Zip: Denver CO 80294

United States District Court
901-19th Street, Room A105
Denver, CO, 80294



LEGAL MAIL
FACILITY _____ DATE REC'D _____
STAFF LAST NAME _____ ID # _____ INT _____
DOC # 188480 OFFENDER LAST NAME Peterson Wayne

"D" Statement of Claims

Claim one - Religious Freedom claim

RFRA, 1st Amendment, Colorado Revised Statutes 17-42-102
Retaliation For grieving.

THIS claim is concerning Defendant Benjamin Thiel, the programs coordinator at La-Vista Correctional Facility for his personal involvement in violating my constitutional right to exercise my Religion freely and without Fear.

This court has jurisdiction because The defendant has violated my constitutional rights by Denying me my reasonable opportunity to practice my Religion During my incarceration at La-Vista. The defendant was aware that the facility obtained federal funding for The sweat lodge and that the facility already had all the materials needed to practice the Religion on a weekly basis until the Spring. According to His own Admissions And the fact that lack of materials were never the problem. The defendant was aware that I had a clearly established right to have a reasonable opportunity to practice my Religion, and to not be substantially burdened in the free exercise of that religion. Thiel was aware I had a clearly established right to obtain and use the "Approved" personal faith property on my own time, because He told me I did, and a clearly established right to not be retaliated Against For engaging in a constitutional right.

The defendant Thiel violated my rights to Religion and in doing so, Harmed me by Depriving me of Religious Practice.

My First Amendment Right to practice my Religion Freely has been violated because ~~he~~ I was unable to perform pipe ceremonies, sweat lodge ceremonies or smudge ceremonies in violation of prison regulations allowing those religious practices; Those rights have been violated specifically by Mr. Thiel the programs coordinator. I Demand punitive or nominal damages in an amount deemed necessary by the court for three months of deprivation. This court has jurisdiction because my constitutional rights have been violated by someone acting under color of state law (Thiel).

"D" STATEMENT OF FACTS

From August, 2025 - December, 2025 I was an inmate at the La-Vista Correctional Facility, that has a fenced in area next to unit one, designated for the American Indian Sweat Lodge. I have a Native American Ancestry and I have practiced the Native American religion since I was 8 years old with my family by doing sweat lodge ceremonies, using sage, attending pow-wows, and participating in pipe ceremonies. The interpretation of my religion is from a traditional American Indian culture practiced in Nebraska, I am Blackfoot, Apache, and Cherokee.

My religious practice requires me to attend sweat lodge weekly, participate in pipe ceremonies after using sage, to make and wear a medicine bag, and to not allow no one to touch it or open it, and to not attend sweat lodge on my cycle. My religious practice requires me to conduct these ceremonies in proper order, and to pray during the pipe ceremony. My religious practice also requires me to use prayer beads, stones, and I also like to read my own prayer cards.

I sincerely hold my religious beliefs regarding the Native American ceremonies because they teach about my Higher Power and this is where my faith (in spirit) is.

The defendant, by violating my constitutional rights also went against La-Vista's Administrative Regulation (800-01)

Governing All Religious practices, where The Native-American Faith group is given the opportunity For A sweat, Pipe and smudge ceremony every Thursday From 8am-10am with a lighter provided. It also governs personal Faith property inmates can purchase on their own once approved.

The defendant Thiel is the program coordinator, He is in charge of calling sweat lodge, and He Has All the materials For sweat lodge in His office, which include Sage, A shell for smudging, All different feathers, A blanket, A Drum, A peace pipe, tobacco blend, Cedar, Sweet Grass braids, black and white rope, pipe cleaners, Reading material, ect. All in two small boxes that are light weight and easy to carry. In the shed next to the fenced in area the facility has tarps, blankets, A pitchfork, and wood thats extra, just For sweat lodge. We cannot participate in our ceremonies without our religious materials, None of Thiel's Denials were because we did not Have Sage or tobacco or wood, we never ran out of these items, His Denials were Due to His malicious Discretion only. There were no security threats or lockdowns and no illegal activity.

The defendant refused to Allow me to gather communally, refused to give me materials to perform the ceremonies, changed the rules to only Allow A sage ceremony Against P.O.C policy, and Forced me to mail out my personal faith properties, solely at His Discretion only; To be malicious.

The defendant intentionally interfered with my Free exercise in multiple ways From 9/4/25 - 12/14/25, And denied me Reasonable opportunities to practice my Religion.

on 9/4/2025, myself and another offender asked Thiel if we were allowed to buy a new peace pipe, because ours came Apart. Thiel got irritated and said that we were too worried about smoking so our unit would not meet that week, only Unit 1-4. I Argued that According to policy I can meet once a week when its called. I Told Him I was going to grieve Him so He said my Unit can go From 9am-10am. when I got there Thiel smiled at me and said He is not giving us Any of our materials but we can "sit in there" For An Hour if we want to. He did not bring Any materials on 9/11/25 or 9/18/25. those 3 weeks I was denied the ability to perform ceremonies.

on 9/18/25, Thiel waited for all of us to show up to tell us that if we cant get our Families to donate Redwillow, Then we Cannot do A sweat lodge ceremony until the Springtime. once Again we were denied our materials. when I filed A grievance about this, Major maes who is the programs major responded saying we Are Allowed to do A sweat lodge ceremony every Thursday and All the supplies to do it were in the shed when "we decide to do one." Thiel refused to allow us to do A sweat lodge ceremony For 10 weeks in a row, until I got that response to my grievance, then He Allowed one on 10/23/2025. when He Allowed us to do one, it was 8 hours, He had to bring our lunches, And

spend time helping us get the materials. He did not want to take the time out of his day to do these things for us, He told us He "Had a lot of work to do," He was angry And tried to KUSH US.

on 9/25/25, 10/2/25, 10/9/25 Thiel Refused to call the movement for American Indian sweat lodge. He claims "no-one" showed up, but at least 6 people those weeks could not leave their unit because He Failed to call the movement. On 10/2/25, After I was moved to unit 1, myself And Kallie Sawyer waited outside next to the fenced in Area, we saw Thiel with the supplies go into shift command, From 7:45 am - 8:17 am we waited next to the Fenced in Area. at 8:17 am we went inside unit 1, Officer Jerardo Radioed Thiel And told Him "Two inmates Have been waiting for sweat lodge but it hasn't been called" Thiel told Her "movement is over, I went there And no-one showed up." She Apologized because she knew it was never called. He intentionally did this because I was grieving Him And He saw me waiting out there for sweat lodge.

on 10/16/2025, we had just started the pipe ceremony Right After we did our sage, And Thiel walked all the way up to the fence And demanded we give Him the lighter. When I told him we just started the pipe ceremony He told me He don't care, He said that we needed to do the Pipe ceremony First, that we

were taking too long to use the lighter and if we want to do our pipe ceremony we can use a stick on fire. After I handed him the lighter I told him, it's not proper to do a pipe ceremony before we sage, he said that me grieving him does not bother him, and he "don't take it personally." Then he walked away with the lighter. We were prevented from completing a pipe ceremony and a sweat lodge ceremony that day.

on 10/23/25, we were allowed to do our sweat lodge ceremony because of my grievance, but Thiel was angry about it. He kept telling us we have the right to do a sweat ceremony once a week, and that he has extra wood, and that he has 2,000\$ in a trust fund to buy a new inipi. ect. Then he got impatient and said he has a lot of work to do so we need to hurry in the shed.

on 10/30/25, I was not able to attend the sweat lodge area because I was on my cycle.

on 11/6/25, Thiel said he was holding a meeting only to get a list of supplies we want to buy, he said we can all make one list, give it to one person and that way we don't all have to go just to give him the list. in the list we came up with polished stones, a new peace pipe, onyx, Jasmine, ect. we gave the list to one person, none of the people who go weekly

went to the meeting because of what Thiel said. but instead of Thiel "only getting a list of things we want to buy," He CHANGED it to where we now only do A Sage Ceremony And A pipe or Sweat Ceremony is only once A month, AGAINST policy. He stated that "since none of us went to the meeting we didn't have A say." He manipulated the situation for all of us who attend, or tried to attend weekly.

on 4/13/25, Thiel waited next to the fenced in area with officer L. MARTINEZ, I walked into the fenced in area, and asked another inmate "what changed, and what was said in the meeting." I didn't raise my voice or curse, yet Thiel stopped me and said I need to "leave for being disruptive." but I am allowed to talk while I am being "saged into the circle." I immediately complied.

At that point, Thiel has literally done everything he can to stop me from practicing my religion. He has harassed me, made comments that I "only care about smoking" that I "look like I'm smoking a crack pipe," that I "have mental health problems I need to see A Dr. For." That he don't care that I grieve him, he can do whatever he wants, maybe I should become Christian, ect.

⑤

on 11/14/25, I Filled out A D.O.L Form For personal Faith property, one For six polished stones for my medicine bag, one For oracle cards, both From the Approved vendor, And both Forms to purchase the personal Faith property were Approved. On 11/21/25 I Sent Thiel A Kite like He Asked, that outlines my entire order that Included only Approved Items on the form, Thiel responded "not Authorized, we did not Agree on this method." my grievance for this was granted, saying Thiel went Against policy And had no Right to deny me my personal Faith property yet on 12/4/25 Thiel told property I could not Have the Items, so they Forced me to mail them Home. I was prevented From practicing my Religion by not being Able to Read my oracle cards And not being Able to use the polished stones in my medicine bag. On 12/10/25 I was taken to Classification Unit to be brought back here to denver Woman's Correctional facility. on 11/25/25 I Filed the grievance on Thiel Reuesting A major step in to Allow me to Have my personal Faith property, on 12/4/25 I was Forced to mail them out, then a few months later I recieved the response to Grant my grievance but Thiel had already deprived me of my personal Faith property. I Also Filled out A personal Faith property request Form For prayer beads (one strand only) From the Approved vendor, And Thiel Denied this Form All together.

so, based on the information and dates above, the defendant placed a substantial burden on my free exercise of religion, and denied me any reasonable opportunities to practice my religion from 9/4/25 - 12/10/25, when I was transferred here to Denver women's. All the weeks stated above, includes denials that were not ever due to security threats, lock downs, illegal activity, or modified operations and were solely because of the defendant's discretion. The defendant consciously chose to prevent me from practicing my religion in a group or individual setting because he was being malicious towards me for grieving him and I believe his actions for months add up to a constitutional violation. It is my religious belief that to do these three ceremonies is a form of worship and I use the pipe ceremony to send my prayers up with tobacco smoke, I do not use tobacco outside of prison otherwise. To worship and pray is essential to my wellbeing and I was very grateful that the la-Vista facility offered it at all, and I was greatly affected while Thiel denied my ability to participate in these ceremonies for my religion.

In August, 2025 Thiel explained to me and to officer Flayed in unit 5 that as long as we are approved on the list, we have the right to do sweat lodge once a week, and that these ceremonies even allow us to have a "work proscription" every Thursday, meaning we are excused from work, no matter what, every Thursday.

(6)

unjustified deprivations of a prisoners own religious items violate the First Amendment and RFRA and are directly actionable in Federal court. Not only did Thiel force me to "mail out" my personal Faith property in December but He had Kitchen staff to take and confiscate my medicine bag, even though I was allowed to wear it to work under my shirt, and even though I had worn it before to work. Kitchen staff called him then took my medicine bag, put it in a glove and threw it away. I'm not suing for my medicine bag, only for my personal Faith property I bought.

I fought very hard to resolve these issues stopping me from practicing my religion, I talked to two different shift commanders, five officers, two majors, and sent at least 8 grievances all the way to step 3.5 I was transferred before anyone at la-vista even did anything. The whole facility allowed Thiel to treat the participants to the sweat lodge however he wanted to treat us. The lack of weekly sweat, smudge & pipe ceremonies at sweat lodge violates the core tenets of my religion. When we noticed he provided materials to make the medicine bags, we made some but Thiel told us we had to "leave our arts and crafts" outside in the fenced in area. But when he provided Bibles for others, they are allowed to bring them back. A medicine bag is not supposed to be left outside, they are supposed to be worn, he wanted us to go against our religion.

I Demand Relief In the form of Damages, Punitive or Nominal Damages For Three months of not being Allowed to exercise my religion And For Forcing me to mail out my brand new personal Faith property.

In An amount deemed necessary by the Court, plus the (450.00) Amount they took to File the Case, the Cost of the personal faith property + Cost to mail out that property, in total no less than 10,000⁰⁰ For Ten weeks of Denying sweat lodge Ceremonies, Six weeks of Denying Heims to perform other Ceremonies, with Harassment And retaliation.

" " D Statement of Claims Continued,
Statement of Facts Claiming Thiel's Retaliation
For Grieving Him.

I, Allege The Following Chronological Events to show
I Reasonably believe Thiel Retaliated Against me. This
is based on His actions preventing me from practicing
my Religion After I Grieve, Kite & report Him, And his
comments before And After Grieving/Complaining About
Him Denying me From participating in my religious
Ceremonies. His Comment before Filing my Grievances
Are pleasant, Always Claiming I Have A Right to this or
that, And After I Grieve Him He Completely prevents
me From practicing, Interrupts my Ceremonies to make
Harassing comments or comments that I need to change
how Im Doing my Ceremonies or to take Items needed
to do the Ceremony like the lighter. During these inter-
actions After I Grieve/Complain About Him, He Almost
Always mentions my Grievance I Filed, which to me
prove He is retaliating Against me For those Grievances,
Especially because He has no Valid excuse For preventing
me, like no illegal Activity suspicions in sweat lodge, no
Security lockdowns, or Fire bans, no prison lock downs
or modified operations, And no need to purchase
more Sage or tobacco since According to Thiel's own
words we "Have enough Sage & tobacco to Do A pipe
And smudge Ceremony every week until spring time"

Facts For Retaliation For engaging in A Constitutionally protected Activity (Grieving)

on 8/5/2025, Thiel Received AR Form 800-DIF "Request
For Change of Faith Group Affiliation" Filled out on 8/1/2025,
To Change my Faith to "American Indian"

on 8/21/2025, I lived in unit 5, where Thiel's office is, I met
Thiel 30 minutes early, He said I could carry the two small
boxes that hold all the supplies for the sweat lodge. Thiel
only allowed a smudge + pipe ceremony this week and on 8/28/25.
Both weeks I helped to set up, Thiel told us we can do a sweat
ceremony but we have to tell him ahead of time. So on 8/28/25
we told him we want to do one the next Thursday. (when he
said we have to tell him ahead of time, that was not true
according to Major Maes and he said that "against policy." Thiel.
On multiple occasions regarding exercising my religion has
"made rules up" to convenience him and his schedule that
went completely against policy. We actually told him on
8/21/25 and 8/28/25 that we want a sweat lodge ceremony.
He denied us so on 8/28/25 we told him we were
going to grieve him and I told my spouse to call the
prison and complain about him denying us a sweat, and
she called three times to complain.

Then on 9/4/2025, I went early to grab the boxes and offender
Lopez told Thiel she wanted to buy a new peace pipe, and she

Told Thiel That she grieved Him, I witnessed this conversation, And I told Thiel I would donate if we need A new Peace pipe, Thiel got Angry At Lopez And told Her that she is "Too worried About Smoking." Then she walked Away to Write Her Grievance, Thiel Told me He dont need my Help so I went Downstairs to wait by the office For Thiel To Call movement, I overheard Thiel tell the officer that we Have A Right to All meet together once A week no matter what. So When Thiel Came Down, With out the boxes He told us "Im not calling movement, because Im only Allowing units 1-4 to meet this week, Since I overheard Him I told Him "Your not Allowed to do that, I Can meet once A week For Sweat lodge," He said "Fine I Will call units 1-4 From 8-9am, then Unit 5-7 From 9-10am. But when We showed up Thiel left our supplies in His office, He Said "Im not Giving you Any Of your Supplies." He could not give us A Reason, He Said we Could stand there For our Hour And do nothing. He was clearly mad we said we were Grieving Him. As We all walked Away we said we were going to Grieve Him For this, He mentioned that we Can Have our Families call in to Complain if we want. on 9/11/25, I Had to See the parole board but Thiel did not bring the supplies Again. I grieved Him on 9/4/25 on 9/18/2025 He had A "meeting" with us before He would Allow us Into the sweat lodge Area. He told us that if our Families did not donate directly to Him (where He could Drive to pick stuff up) then We could not Do A Sweat Ceremony until Springtime. He wanted An inipi Donated. We Had

A USAble inipi Already put up. Once again this was a condition placed on us by Thiel that went against policy. Thiel claimed "A sweat ceremony is 4h & 8 per day and A lot of work." on 9/4/25, 9/18/25 and 9/25/25 Thiel refused to give us our materials for our ceremonies. For no valid reason, no security threats, lockdowns, lack of supplies, solely at his discretion because we were grieving him. on 10/1/25 I grieved Thiel for denying a sweat ceremony and on 10/10/25 major males responded that sweat lodge is available every Thursday and supplies are in the shed when we need them we can do a sweat ceremony. So then on 10/2/25, 10/9/25 and 10/16/25 Thiel failed to call movement so unit officers would not allow offenders to go to the sweat lodge because "movement hasn't been called." Everytime I grieved him, he found new ways to prevent me from practicing my religion or prevent me from gathering communally like on 10/16/25 where I was the only one who showed up because I was in unit 1 and staff allowed me to wait in "little yard" until I saw Thiel. I grieved him on 10/1/25 because I was outside next to the sweat lodge waiting from 7:45am - 8:17pm but Thiel said "No one showed up" so I couldn't go. I grieved the next two weeks he refused to call movement. On 10/16/25, alone, I told Thiel "The last two weeks and today you didn't call the movement, so officers are not letting other offenders and myself out." He got on his radio on 10/23/25, after I grieved him about movement, and I watched him tell control

"Can you please call movement over the whole facility for the Native American Sweat lodge" Movement was then called and I realized Thiel had to personally Radio Control to call Movement because he had the only Authority to start that Religious program Weekly and I realized he failed to call Movement intentionally. On this day, 10/23/25, while we waited for other offenders to show up, he mentioned to me that when I grieve him he "don't take it personal." He laughed at me for grieving him and was still talking about it when other offenders showed up saying how he can "help me grieve better," and that he can show me how to "be more effective with my grievances." I told him I just want a reasonable opportunity to practice my Religion and to do my Worship, Ceremonies and prayers Weekly. Once I said that he asked us on the spot if we want to do a Sweat Ceremony (an 8 hour day). even though we didn't plan it ahead like he said or even though our families didn't donate a new inipi. I realized we had the ability to do a Sweat Ceremony this whole time but was denied the past ten (10) weeks in a row because Thiel refused to allow it. While we got the blankets and extra wood from the shed, Thiel tried to rush us, saying he has too much work to do and since this ceremony lasts up to (8) hours he still had to go get all of us our lunches. Six people participated. On 10/30/25, I could not go because I was on my menstrual

Cycle.

on 11/16/25 was a meeting, Thiel said we don't all have to show up, just to give a list of Faith Items as a group we all want to buy, to one offender to bring to him, to discuss what we want. So we followed his orders but

on 11/13/25 Thiel said "Since none of you showed up..." (referring to all 6 of us who attend weekly & grieved him)

I agreed that from now on we will only do a ~~Smudge~~ /

Smudge Ceremony with sage weekly and the pipe / sweat ceremonies will only be done once a month.

As I went to walk past him I asked an inmate who we gave the list to, "What happened at the meeting?"

And as she said "Thiel wants only a smudge done weekly" Thiel heard her and told me "Your being disruptive now you need to leave."

Immediately I left, he had officer L. Martinez with him for some reason, but I was not being disruptive at all, actually I was

standing with my arms out so the inmate I was talking to could smudge me. So he told me to leave all

because I was talking, which I am allowed to do. I am Native American I have that right.

The more I grieved him the more he maliciously prevented me from participating in my ceremonies.

Then on 11/14/25, I tried to practice my religion through different means because I was afraid of Thiel threatening me with that officer on 11/13/25. So I

Filled out Two Forms to Approve Two Types of personal Faith property. one For polished Stones, one For oracle Cards. My Forms were Approved so on 11/21/25, I sent a Kite with an outline of my order just like Thiel instructed me. He said I could pay for my approved items from the approved vendor and send him a kite with my order, and that I could hand him a money order to purchase the items or have family order them online. I said I could possibly do a money order if not my family. He agreed.

on 11/14/25 I sent a kite also to shift command Salbatto explaining how Thiel is going against the AR to allow me to do my ceremonies & participate. I received no response. Then I sent a kite to major field on 11/29/25 because Thiel responded to my kite with my order saying "not authorized, we did not agree on this method." major field responded "I fully support the direction of Lt. Thiel, then Thiel sent my kite back saying my order was "not authorized, we did not agree on this method."

So Thiel approved my two forms, I sent kites to Salbatto and major field, then Thiel said my order was not authorized. So I grieved him saying I need someone above Thiel to allow me to get my personal Faith items in property. on 12/15/25 Thiel forced me to mail out my approved personal Faith items. My grievance was answered too late, I got it in Feb. 2026, it was

Granted because it says Thiel went Against policy by denying me those items but it was too late.

On 11/14/25 Thiel brought me the Forms with Lt. Rodecave as a witness, Thiel said "Your orders since Approved will go to property, and property will call me to verify" Thiel then stated "If I Deny them you can bring these Two Forms to show me those items are Approved, so keep these Forms." So when they got to property 10 Days later and Thiel Denied them, I brought the Forms to show Lt. Rodecave, All he said was that Thiel was just Doing that "because I grieved him." I never got my oracle cards to practice Reading With. Or My polished stones to put inside my Medicine bag.

I believe With the denials For Three months, And Thiel's actions only, After Grieving him proves His Retaliation. He retaliated Against me Every Time I grieved him by preventing me from practicing My Religion.

Thiel kept our materials for no valid reason, He failed to call movement when He could have and He denied a sweat ceremony 10 Weeks because He was "Too busy" even though it does not require supervision, and He forced me to Mail out my Faith property "Against policy!" Then changed sweat lodge to monthly Also Against policy.

Declaration By Yvonne Peterson

I, Yvonne Peterson Swear the following information is True and Correct to the best of my Ability Under Penalty of Perjury. 2-20-2026

From 9/4/25 - 12/10/25 I was not afforded sufficient means to practice my Religion, when Thiel refused to bring our religious items from his office, He prevented us from reading our religious materials, participate in our three ceremonies, and to pray communally. The lack of a Weekly sweat lodge, pipe and smudge ceremony at the sweat lodge violates the core tenants of my religion, outside of prison, these ceremonies are done weekly. Thiel denied us these materials because he would not bring them from his office in Unit 5, not for any other valid or reasonable reason. Just to stand in the fenced in area is not sufficient means to practice the Native American Religion.

Since 9/4/25 Thiel placed a lot of pressure on me to not want to do a pipe ceremony, He Harassed me, commented on how I look smoking, Attempted to force me to do the pipe ceremony first, Against my religion, and fast for his convenience. Then He completely took away the weekly pipe ceremony because He did not think we should be allowed to smoke even though it is used to pray and even though I do not smoke cigarettes outside prison. He did this Against D.O.C Policy, and Against my religion.

praying by pipe ceremony Weekly Is A core tenent of my religion, but to do it properly I must First Sage Into A Circle.

None of Thiel's denials were for "good order, security, discipline, limited resources, or costs of materials, they were solely to be malicious.

From 9/4/25 - 12/10/25 I was denied the opportunity to practice the tenets of my Religion And I was discriminated Against For trying to practice my Religion. Other inmates Have got personal Faith property that was Approved, And Thiel did not Harass Or Intimidate other inmates with other religions like he did to me.

When I showed shift Command the AR 800-a, He Read it And said I should be Allowed to do my three Ceremonies weekly, that he would speak to Thiel, but still Thiel did not Change.

From 9/4/25 - 12/10/25 Thiel Restricted The Native American Sweat lodge Inconsistently, First he Failed to bring our supplies, then He refused to call movement, then He would take the lighter in the middle of our pipe ceremony, And when I bought my personal Faith property he Forced me to mail them out. He Attempted Multiple times to coerce me into either doing the pipe ceremony First or not at all, which is not how I'm supposed to practice my beliefs, I am required to sage prior to going into the circle for the pipe ceremony, to pray. Thiel tried to claim that we were "too worried about smoking" so He prevented us from doing All three ceremonies but He could have still let us do a sweat ceremony and A sage ceremony but he didn't. My behavior at the sweat lodge on Thursdays would be to gather with other participants to sage each other with the feathers and smoke, enter the circle with them and say our prayers with the peace pipe in the same order we saged, and when Thiel took our materials, He told us to "stand there" together, he pressured us to modify our behavior to violate our beliefs because the sweat lodge Area is supposed to be Sacred Ground, people don't just walk around to do nothing, our ceremonies are sacred. When Thiel refused to allow us to do A sweat ceremony For ten weeks in a row, kept our materials in His office, And Failed to

call movement, it was more than an inconvenience, He completely interfered with central beliefs of the Native American Religion. My participation in these three ceremonies weekly are motivated by sincerely held religious beliefs but that was intentionally prevented for three months. In the two boxes that Thiel held inside his office specifically for the sweat lodge, there were reading material that we could all read out loud together, kinda like chants or prayers, one page was equivalent to the daily bread prayer by Jesus in the Christian religion where we ask Wankatonk to bless our hands and when Thiel kept our supplies in his office he also prevented us from reading those 5 pages together. Thiel was aware of the reading material he held in those boxes because he showed them to me in August when I first got to La-Vista and approved under that religion.

my religious belief is that I should have faith in the spirit of all things, to pray to Wankatonk or spirit or my ancestors while I pass the peace pipe, and to cleanse my energy with sage because I believe evil spirits cling on to people and things; I believe the contents of my medicine bag are private and depends on what I want to work on in my life, and should not be touched by other people, and all of these beliefs got violated for three months when I was prevented from

Participating in The Native American Sweat lodge. Restricting me from doing these ceremonies were not done for a legitimate correctional purpose because at those times there were no lockdowns, or illegal activity, no officers stopped the sweat lodge, it was all done at Thiel's Discretion to be malicious because I was grieving him. The facility did not lack supplies or materials, Thiel was "too busy" to allow us to do a sweat lodge ceremony for those 10 weeks, because once I grieved it, Major Maes responded that supplies are in the shed upon request, yet every single week I requested to do that ceremony with the other two.

When Thiel brought me my "Personal Faith property request Forms" officer Lt. Rodecape was with him, Thiel said "If later on down the road I deny these items in property you can show me these forms and say 'Remember, Thiel you approved them' and I will remember to give them to you." Thiel laughed after he said this, so on 11/24 when Thiel Denied my Faith property (10 days after I seen him with Rodecape) I went to Lt. Rodecape who told me, "He is doing this because you grieve him" and Lt. Rodecape did not do anything about Thiel denying my property that was at property. I was forced to mail out my Faith items and prevented from reading my cards or using my stones.

Sincerely, Yvonne Peterson 2/20/2026