

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

UNITED STATES DISTRICT COURT

for the

Middle District of Florida
Ocala Division

JUL 21 2025 AM 8:59
FILED - USDC - FLMD - OCA

Oscar Contreras Aguilar

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Donald J. Trump, et al.,

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No. 5:25-CV-00396-MSS-PRL

(to be filled in by the Clerk's Office)

VERIFIED COMPLAINT

Pursuant to 28 U.S.C. § 1331

(verified, see section IX. "Certification & closing")

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules 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.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Oscar Contreras Aguilar

All other names by which
you have been known:

Aka: Fendii G. SKYY

ID Number

Reg# 90039-053

Current Institution

U.S. Penitentiary - Coleman 2

Address

P.O. Box 1034Coleman
CityFL
State33521
Zip Code**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Donald J. TrumpJob or Title (*if known*)President of the United States of America

Shield Number

N/A

Employer

U.S. Government

Address

1600 Pennsylvania Ave, N.W.
Washington D.C. D.C. 20500
City State Zip Code☒ Individual capacity☒ Official capacity**Defendant No. 2**

Name

Pamela BondiJob or Title (*if known*)U.S. Attorney General

Shield Number

N/A

Employer

U.S. Government / U.S. Dept. of Justice

Address

Washington 20530 950 Pennsylvania Ave, N.W.
Washington D.C. 20530
City State Zip Code☒ Individual capacity☒ Official capacity

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

Defendant No. 3

Name

William K. Marshall

Job or Title (if known)

Director, Federal Bureau of Prisons

Shield Number

N/A

Employer

U.S. Government / FBOP

Address

320 First Street N.W.

Washington

D.C.

20534

City

State

Zip Code

☒ Individual capacity☒ Official capacity

Defendant No. 4

Name

Shannon D. Withers

Job or Title (if known)

Complex Warden, Federal Correctional Complex - Coleman

Shield Number

N/A

Employer

U.S. Government / FBOP FCC Coleman

Address

P.O. Box 1034

Coleman

FL

33521

City

State

Zip Code

☒ Individual capacity☒ Official capacityPlease See Continuation page
(attached) For the rest of defendants

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☒ Federal officials (a *Bivens* claim) Pursuant to 28 U.S.C. § 1331☐ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Plaintiff sues under 28 U.S.C. § 1331

Constitutional rights being violated are:

- 1) First Amendment (Freedom of speech / right to express gender);
- 2) 5th & 14th Amendment's Equal protection clause
- 3) 4th Amendment's protection against unlawful & unreasonable searches of one's body.
- 4) 8th Amendment (prohibition of cruel & unusual punishments)

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

N/A

III. Prisoner Status

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

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

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed. (see attached Continuation pages for details of facts)

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

N/A

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

U.S. Penitentiary - Coleman 2 and White House (Executive Order).

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

C. What date and approximate time did the events giving rise to your claim(s) occur?

Executive Order No. 14168 was signed by defendant Trump on January 20th, 2025. And From 01-20-25 through current date BOP officials continue enforcing and implementing Trump's executive Order No. 14168

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

See attached Continuation Pages
For Complete details.

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

extreme emotional distress; mental, emotional, and physical pain; exacerbation of mental illnesses including gender dysphoria and Major Depressive Disorder, etc. - mental deterioration and decompensation to the point of having suicidal thoughts and ideation; humiliation and discrimination. Crying a lot, severe sadness and fear, etc. Constant crying, constant thoughts of suicide, plaintiff is contemplating suicide to the things mentioned herein.

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

preliminary and permanent injunction enjoining defendants from enforcing and/or implementing Trump's executive order No. 14168 as to plaintiff; declaratory relief stating Trump's executive Order No. 14168 is discriminatory and persecutes transgender people; and order striking down Trump's executive Order No. 14168 as discriminatory and unconstitutional; preliminary and permanent injunction enjoining defendants and BOP from discontinuing plaintiff's gender-affirming care; preliminary & permanent injunction maintaining the status quo (enforcement of BOP's Transgender Offender Manual) p.s. 5200.08) preliminary and permanent injunction enjoining defendants and BOP from subjecting plaintiff to random pat searches and strip searches by male guards; preliminary and permanent injunction enjoining defendants and BOP from misgendering plaintiff by using male pronouns when referring to her; preliminary & permanent injunction directing defendants and BOP to continue making available to plaintiff female undergarments and cosmetics and make up items.

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

But Administrative remedies are futile and a dead end because this lawsuit challenges a presidential executive order which the FBOP cannot (is powerless) change.

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

U.S. Penitentiary - Coleman 2 (USP Coleman 2)

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

But Most of the time Unit Team staff members employ spinning tactics and deceit to deny inmates requests for grievance forms.

☐ No

☐ Do not know

In this case they claim the President's executive order is a "non-grievable" issue, and thus refuse to provide grievance forms.

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☒ No

☐ Do not know

If yes, which claim(s)?

*FBOP is powerless to change a President's executive Order
Trump's executive Order leaves the BOP no discretion to do otherwise from what is stated in the Executive Order No. 14168*

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☐ Yes

☒ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☒ No

- E. If you did file a grievance:

1. Where did you file the grievance?

N/A

2. What did you claim in your grievance?

N/A

3. What was the result, if any?

N/A

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

N/A

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

First of all, the FBOP is powerless to provide any relief due to the fact that plaintiff's claims arise out of a President's executive order which the BOP cannot change.

Second, even BOP Unit Team staff and USP Coleman & Warden have stated that this is a "non-grievable" issue and thus they cannot provide grievance forms.

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

Defendant Warden E.K. Carlton, the beginning of June, 2025, verbally during mainline. Warden Carlton stated: BOP does not have the authority to override the President's executive order.

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

Same as above.

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

Most of my lawsuits have made it past motion to dismiss or Summary Judgment. I have prevailed in at least one see: 1:19-cv-118 (AST/JFA) (E.D. Va).

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition. _____

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

☒ Yes☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s)

Oscar Contreras Aguilar

Defendant(s)

Lt Luna, et al., (county jail guards)

2. Court (if federal court, name the district; if state court, name the county and State)

Eastern District of Virginia

3. Docket or index number

1:19-cv-118 (AJT/JFA)

4. Name of Judge assigned to your case

Honorable Anthony J. Trenga

5. Approximate date of filing lawsuit

January, 2019

6. Is the case still pending?

☐ Yes

☒ No

If no, give the approximate date of disposition

January, 2023

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Settled through Confidential Settlement Agreement.

Other lawsuits: 4:23-cv-582 (D.Az) (pending); 4:23-cv-268-SHR (D.Az) (pending); 1:25-cv-208 (M.D.Pa) (pending); there have been others (about 12 total) those are closed. The plaintiff is not aware of any strikes against her entered by any Court. Most of her lawsuits have had merit.

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I 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, modifying, or reversing 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.

I declare Under penalty of Perjury that the foregoing is true & correct. 28 U.S.C. § 1746.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07-10-25

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address

[Signature]
Oscar Contreras Aguilar
90039-053
U.S. Penitentiary - Coleman 2
Coleman FL 33521
City State Zip Code

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City State Zip Code

Telephone Number

E-mail Address

CONTINUATION OF COMPLAINT FORM'S Section IV. "statement of claims" (d) - STATEMENT OF FACTS -

- 1) In January, 2025, defendant Trump issued Executive Order No. 14168, titled: "Defending Women From Gender Ideology Extremism & Restoring Biological Truth to the Federal Government" (hereinafter "E.O. No. 14168"), which clearly discriminates on the basis of sex.
- 2) E.O. No. 14168 singles out transgender women, and, among many other things, orders the U.S. Attorney General (defendant Pamela Bondi) to ensure that "no Federal Funds are expended for any medical procedure, treatment, or drug for the purpose of conforming an inmate's appearance to that of the opposite sex." id., §4(c). The E.O. No. 14168 also does not recognize one's gender identity, and only recognizes "male" or "female".
- 3) Plaintiff Oscar Contreras Aguilar ("plaintiff") better known as "Fendii G. Skyy" (her female name to which she is in the process of changing it to), is a 27-year old transgender woman who has been in Federal custody since 2017. Plaintiff has been diagnosed with "Gender Dysphoria" which is considered a serious mental illness. Plaintiff has been receiving gender-affirming treatment since July, 2024. The treatment she currently receives is the HRT or "Hormone Replacement Treatment" which consists of medication such as Spironolactone (Testosterone blocker) and Estradiol (estrogen). Plaintiff identifies as female and thus uses feminine pronouns when referring to herself. Plaintiff looks very feminine and is highly emotional.

Continuation of Section IV. (D)

2 of 7

- Statement of Facts -

Plaintiff has also been diagnosed with: Antisocial Personality Disorder, Adjustment Disorder w/ depressed mood, Major Depressive Disorder, etc... Some of which are considered to be serious mental illnesses.

Plaintiff has been prescribed psychotropic drugs to treat such mental illnesses since at least 2023.

4) The plaintiff has a long, well-documented history of severe mental health issues and suicidality. Plaintiff has attempted suicide numerous times while in BOP Custody.

5) The plaintiff was sexually abused and molested as a child in El Salvador. Plaintiff was also as recent as November, 2023, as a transgender woman, sexually assaulted by BOP officers in the SHU at USP Tucson. All this sexual abuse and assaults are documented in plaintiff's PSR and BOP psychology records.

6) As a direct result of defendant Trump's E.O. No. 14168 and defendant's & BOP's implementation of that order, BOP officials have started to persecute transgender women such as plaintiff in BOP custody. The BOP has started to discontinue gender-affirming care that was being provided to transgender women.

In fact, recently, medical staff at USP Coleman advised plaintiff that due to Trump's E.O. No. 14168, the BOP will discontinue plaintiff's "gender-affirming care in the foreseeable future" unless "you are protected by court order," and encouraged plaintiff to file suit.

Continuation of Section IV(D)

3 of 7

- Statement of Facts -

7) Soon after defendant Trump's E.O. No. 14176 was issued, the BOP, on February 25th, 2025, canceled/rescinded in its entirety the BOP's Transgender Offender Manual P.S. 5200.08 ("transgender policy"), and directed its removal from federal prison libraries and the BOP intranet.

The transgender policy, id., provided guidance to staff in treating transgender prisoners in a manner consistent with the Federal Prison Rape Elimination Act, 42 U.S.C. ch. 147 § 15601, et seq.

Recognizing the "increased risk of suicide, mental health issues and victimization of transgender inmates," their housing placements were considered on a "case-by-case basis." Transgender prisoners were also protected from searches by guards who don't share their expressed gender, and BOP staff were prohibited

from deliberately misgendering prisoners. That is no longer so. Under new BOP guidelines, BOP staff must "refer to individuals by their legal name or pronouns corresponding to their biological sex," and search accommodations "are no longer authorized." Also banned: "clothing accommodations," including "undergarments that do not align with an inmate's biological sex."

8) Further as of January 25, 2025, the BOP no longer maintained a tally of transgender prisoners in its custody. But a week earlier, it reported holding 1,529 transgender women in custody.

Continuation of Section IV. (D)

- Statement of Facts -

4 of 7

9) Gender Dysphoria is a serious mental illness. And gender-affirming care and treatment for gender dysphoria are considered "medically necessary" by the American Medical Association, the American Psychiatric Association, the American Psychological Association, and the Endocrine Society. Furthermore, the WPATH Standards of Care for the Health of Transsexual, Transgender & Gender-Nonconforming People are the internationally accepted medical standards for the treatment of Gender Dysphoria, and they explain that hormone therapy, "Changes in gender expression and role," and gender Confirmation Surgery are all forms of G.D. treatment that people such as plaintiff may need.

10) As a result of defendant Trump's E.O. No. 14168 and the BOP's implementation of that order, Plaintiff has been subjected to strip searches and pat searches by male guards, over plaintiff's objections.

Ever since defendant Trump issued E.O. No. 14168 and the BOP's cancellation of its transgender policy, Plaintiff has been strip searched at least twice in front of male guards, Plaintiff was forced to get completely naked and show the male guards her butt by bending over, spreading her buttocks and squatting. Plaintiff has also been pat searched by male guards at least seven times now since E.O. No. 14168, over plaintiff's objections. Specifically, when plaintiff raised concerns and objected to being either strip searched or pat searched by male guards, BOP officers stated "You are not a woman. You are a man in a men's prison," and "President Trump doesn't allow us to treat faggots & queers as women anymore," or words to that effect all while mocking & harassing plaintiff.

Continuation of Section IV. (D)

5 of 7

- Statement of Facts -

ii) Prior to defendant Trump's E.O. No. 14168, the BOP, including USP Coleman 2, provided Female Undergarments to transgender women prisoners, including plaintiff, Upon arrival at the institution. And Female Undergarments as well as other Female Cosmetics such as lipstick, lip gloss, bras, hair dye, nail polisher, eye shadow, Foundation, eye liner, make up, etc... were always available from Commissary. That is no longer the case.

And, in fact, BOP staff have confiscated such items and discarded them in their entirety from the prison, despite inmates such as plaintiff having purchased such items from canteen. In contrast, Cisgender inmates at USP Coleman 2, and throughout the BOP, are still being provided male undergarments and are able to purchase male cosmetics such as tank tops, men's body wash, hair gel, etc... and undergarments such as boxers from Commissary. And non-transgender women in women's prisons in the BOP are still being provided female undergarments and cosmetics and make up items. The only ones not allowed to purchase or have such items are transgender women like plaintiff.

All of the female undergarments and cosmetic items mentioned above were available to plaintiff (and trans women prisoners) under the recently-rescinded BOP Program Statement 5200.08 titled "Transgender Offender Manual".

The BOP, as a result of Trump's E.O. No. 14168, is actively and systemically precluding plaintiff and transgender women prisoners from expressing their gender.

Continuation of Section IV. (D)

6 of 7

- Statement of Facts -

12) As a direct result of defendant Trump's E.O. No. 14168, and the BOP's implementation of that Order, plaintiff is now being forced by BOP staff to wear male Undergarments; BOP staff are now deliberately & maliciously, with the intent to harass, misgendering plaintiff by referring to her using male pronouns such as "He", "Him", "His" and/or words to that effect, even though they are well aware, or should be aware, that plaintiff identifies as Female and has done so for years, and that their deliberate misgendering of plaintiff, coupled with the random and intrusive strip searches of plaintiff by male guards, and the pat searches by male guards (every time plaintiff is pat searched by male guards, the guards grope her breasts), causes plaintiff severe psychological pain and extreme emotional distress, and greatly exacerbates plaintiff's Gender Dysphoria and Major Depressive Disorder symptoms to the point of having suicidal thoughts and ideation, and crying a lot.

13) And plaintiff is, in fact, now constantly having suicidal thoughts & ideation, and has been contemplating suicide as a result of all of the above. To be sure, the plaintiff is extremely fearful, ~~that~~ she spends 95% of her time in her cell and she refuses to go to outside recreation or even report to her psychology appointments because plaintiff fears being pat searched and called a "man" by BOP male guards every time she steps out of her unit.

Continuation of Section IV. (D)

7 of 7

- Statement of Facts -

14) As a result of defendant Trump's E.O. No. 14168, and the BOP's implementation of that Order, BOP staff is now ~~potentially~~ systematically subjecting transgender inmates such as plaintiff to harsher, more degrading treatment than their cisgender counterparts; The BOP has ceased providing gender-affirming care to transgender inmates and, as medical staff have advised plaintiff, the BOP will now only provide gender-affirming care to transgender inmates who are protected by Court order.

Currently plaintiff is not protected by Court Order and thus she is at a high risk of being taken off of her gender-affirming care at any time by the BOP which will be devastating to plaintiff's health and put plaintiff in a life-threatening situation.

Lastly, defendant Trump's E.O. No. 14168 leaves the BOP no discretion to do otherwise than what it is stated in the Executive Order, id.

As such without Court intervention, defendants will soon cease providing plaintiff gender-affirming care.

I hereby certify & declare Under penalty of Perjury that the foregoing is true & correct. 28 U.S.C. § 1746. By: Ferdinand Stacey
Name: Oscar Contreras Aguilar
Plaintiff

1 OF 1

Continuation OF Complaint Form's Sections I.(B) (The defendants):

Defendant No. 5 : E. K. Carlton, Warden of U.S.P Coleman 2,

Employer: FBOP / U.S. Government

Address: U.S. Penitentiary - Coleman 2

P.O. Box 1034

Coleman, FL 33521.

In his individual and official Capacity