

In The United States District Court  
For The District of Columbia 1 of 4

Alisha Kingdom, et al.,  
Plaintiffs,  
v.  
Donald J Trump, et al.,  
Defendants

Case No. 1:25-CV-691-RCL  
Executed Under Penalty of Perjury - see pg. 4 of 4  
Attachments: Exhibits A and B.

CLASS MEMBER/INTERESTED PARTY'S PRO SE  
NOTICE & MOTION FOR AN ORDER TO SHOW CAUSE  
WHY DEFENDANTS SHOULD NOT BE HELD IN CONTEMPT

I, Oscar Contreras Aguilar, Reg#90039-053, am  
a member of the Class in the instant Civil action.

I am also the Plaintiff (Prose) in Oscar Contreras  
Aguilar v. Donald J. Trump, et al., Civil No. 5:25-cv-396-MSS  
(M.D. Fla) in which the presiding judge recently  
issued a T.R.O. & Preliminary injunction enjoining  
defendants President Trump, BOP Director William  
K. Marshall, U.S. Attorney General Pam Bondi, etc.

From Subjecting me to Pat down Searches and  
Strip Searches by male guards. see id, at Doc. 31,  
Order dated 10-03-25, granting a T.R.O. and Preliminary  
Injunction. The Court in that case also issued  
an Order directing the Warden of USP Coleman 2  
to advise the Court whether the BOP is Complying  
with the injunction issued by this Court on June 3,  
2025. see Doc. 15, Civil No. 5:25-cv-396-MSS (M.D. Fla) Order  
dated 07-25-25.

To be sure, as of the date of this writing,  
transgender Female inmates (including myself) here  
at USP Coleman 2 still do not have access to  
Female Cosmetics and make up items, etc.. despite  
the BOP representing that we are being provided access  
to such items.

Angela D. Casar, Clerk of Clerk  
U.S. District Court District of Columbia

DEC - 11 2025

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Mailroom

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In a "Notice of Compliance" Filed by the U.S.A and the BOP with the Court in my Civil action mentioned above, the BOP claimed to be "Complying with the June 3<sup>rd</sup>, 2025 injunction issued in Kingdom v. Trump. Plaintiff... [has] access to a Transgender Commissary List." Defendants also claimed "plaintiff continues to receive Social accommodations..." see Doc. 19, Civil No. 5:25-cv-396-MSS-PRL (M.D. Fla) dated 08-07-25.

However, the Court in my case, *id*, had to issue a T.R.O. & Preliminary Injunction Ordering defendants and the BOP to Follow the rescinded BOP Policy Transgender Offender Manual P.S. 5200.08 and its Section which states transgender Female inmates may obtain an exception card to only be pat search or Strip Search by Female Staff, because the BOP and the warden of USP Coleman 2 are refusing to Follow the rescinded policy, *id*, and are refusing to issue such exception to transgender Female inmates, despite such exception being a Social accommodation. As of the date of this writing, I am the only transgender Female inmate ~~at~~ USP Coleman 2 and perhaps even in the whole BOP who has a special I.D. card stating that only female staff may pat or strip search me, and that is only because of the T.R.O. & Preliminary Injunction the Court granted me. see Doc. 31, Civil No. 5:25-cv-396-MSS (M.D. Fla).

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Lastly, the Warden, Eugene K. Carlton, of U.S.P Coleman 2, who is named as a defendant in the Case here in the Middle District of Florida, id., continues to refuse to allow us transgender women inmates access to the transgender Commissary List that was available to us before president Trump issued the Executive Order No. 14168.

The Warden of USP Coleman 2 has been notified repeatedly via direct e-mails about the injunction issued on 06-03-25 by this Court which Ordered the BOP to continue to provide us with social accommodations in accordance with policy and practice in effect immediately prior to the issuance of president Trump's Executive Order, see Exhibits A & B, attached hereto.

Thus, despite Warden Carlton and the FBOP representing to the Court in No. 5:25-cv-396-MSS-PRL (M.D. Fla) that we are being allowed access to a transgender Commissary List, that is Not the Case. It has been almost 5 months since this Court issued the 06-03-25 Injunction, and we are still being denied access to the transgender Commissary List and/or Female Cosmetics (makeup items, etc...).

CONCLUSION

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The FBOP, USP Coleman 2, continues to refuse to provide us transgender Girls (members of the class) access to social accommodations such as the transgender Commissary list and/or Female Cosmetics items or makeup items, or bras and panties on Commissary, etc.. and thus the FBOP, USP Coleman 2 is refusing to comply with the Injunction issued by this Court on 06-03-25, Doc. 68.

Therefore, I hereby respectfully move this Court to: 1) issue an Order to Show Cause why defendants shouldn't be held in Contempt, and impose ~~of~~ Sanctions on them for refusing to fully comply with the 06-03-25 injunction; 2) take judicial Notice of my Civil Action No. 5:25-cv-396-MSS-PRL (M.D. Fla), Aguilar v. Trump, et al, and all the pleadings filed therein as well as Doc. 31.

And for any further relief this Court deems appropriate.

Executed Under Penalty of Perjury Pursuant to 28 U.S.C. § 1746.

October 22<sup>nd</sup>, 2025.  
Coleman, Florida.

Respectfully Submitted,  
~~Jennifer D. Seay~~

Oscar Contreras Aguilar  
Reg # 90039-053  
U.S. Penitentiary-Coleman 2  
P.O. Box 1034  
Coleman, FL 33521  
Class member / Interested party / Movant

TRULINCS 90039053 - CONTRERAS AGUILAR, OSCAR - Unit: CLP-K-A

**EXHIBIT A**

FROM: 90039053  
TO: Warden PEN 2  
SUBJECT: \*\*\*Request to Staff\*\*\* CONTRERAS AGUILAR, OSCAR, Reg# 90039053, CLP-K-A  
DATE: 10/10/2025 01:42:04 PM

No response to this email as of 10-22-25.

To: Eugene K. Carlton  
Inmate Work Assignment: Landscaping

dear warden your response is noted. Theres another issue i respectfully bring to your attention. this facility is not processing my transgender commissary lists/orders. i have submitted 3 separate transgender commissary list orders in the past 2 months. to date, i have not received any of the female cosmetics nor make up items i ordered. please look into this matter at your earliest convinience. thank you.

-----Warden PEN 2 on 10/8/2025 10:07 PM wrote:

>  
Inmate Contreras,

I have reviewed your request, and you should follow the chain of command and request a pat or visual search exception from the associate warden. He will assemble a committee and review your request. The review will include your institutional adjustment, criminal history, history of violence, staff compliance, etc...

From: ~^! CONTRERAS AGUILAR, ~^! OSCAR <90039053@inmatemessage.com>  
Sent: Tuesday, September 16, 2025 4:31 PM  
Subject: \*\*\*Request to Staff\*\*\* CONTRERAS AGUILAR, OSCAR, Reg# 90039053, CLP-K-A

To: Eugene K. Carlton  
Inmate Work Assignment: Landscaping

Dear Warden, I am a transgender woman with a gender dysphoria diagnosis. In accordance with the injunction issued by the U.S. District Court in D.C. on June 3rd, 2025, in the class action lawsuit Kingdom v. Trump, which Ordered the BOP to reinstate the BOP's Transgender Offender Manual P.S. 5200.08, I hereby respectfully request that i be issue a yellow card so that only female staff may pat or strip search me. I have been asking for this for months now. This facility is ignoring my requests for a yellow card and thus this facility is not complying with the injunction mentioned above.

warden responded only after the Court issued the T.R.O. Moreover, BOP P.S. 5200.08 explicitly states that this request for a yellow ID card must be Filed with the warden.

TRULINCS 90039053 - CONTRERAS AGUILAR, OSCAR - Unit: CLP-K-A

EXHIBIT B

FROM: 90039053  
TO: Associate Warden PEN 2  
SUBJECT: \*\*\*Request to Staff\*\*\* CONTRERAS AGUILAR, OSCAR, Reg# 90039053, CLP-K-A  
DATE: 10/21/2025 09:44:00 AM

To: T. D. Avery (A.W.)  
Inmate Work Assignment: Landscaping

Dear A.W. this facility is retaliating against transgenders because of us exercising our 1st amendment right to file lawsuits in court. Recently all the transgender girls in this prison (including myself) had their CMA assignment as transgender on sentry removed. Now laundry and commissary is using that as a lame excuse to deny us access to female undergarments and to the transgender commissary list. The BOP has been ordered by two different federal judges to continue operating under the transgender offender manual P.S. 5200.08, in fact the second federal judge to have ordered that is right here in this district. this prison's retaliatory action to remove our transgender female CMA assignment is clearly unlawful. Laundry and Commissary are telling us "you are not transgender" "you are no on the list" etc... I will file a second emergency for a T.R.O. and a preliminary injunction with the federal court against this prison's administration staff if this issue is not promptly resolved etc., because prison staff here continue to deny me access to BPS-8 and bp-9 forms necessary to exhaust the bop's administrative program, i need not exhaust such remedies if they are not available.as such i will immediately file action in court. I will also file a motion with the court to hold the warden in contempt for refusing to comply with the injunction(s) issued by the federal court in D.C. Thank you for your time. very truly yours Fendi G. Skyy (plaintiff)

Oscar Contreras Aguilar  
Reg# 90039-053  
Federal Correctional Complex  
U.S. Penitentiary - Coleman 2  
P.O. Box 1034  
Coleman, FL 33521

TAMPA FL 335  
SAINT PETERSBURG FL  
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To: Office of The Clerk  
U.S. District Court  
District of Columbia  
U.S. Courthouse  
333 Constitution Avenue, N.W., Room 5523  
Washington, D.C. 20001

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