

Adree Edmo  
IDOC 94691  
ISCI/BHU Unit 16  
P.O. BOX 14  
Boise, Idaho 83707-0014  
Plaintiff

Case No: \_\_\_\_\_ Inmate Name: Adree Edm  
Date: 04/06/2017 Inmate IDOC#: 94691  
Document Title: Motion For Appointment of  
Total Pages: 3 Counsel Inmate Initials Verifying Page Count: AG  
Document(s) 1 of 3

UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF IDAHO

ADREE EDMO,  
  
PLAINTIFF,  
  
v.

IDAHO STATE BOARD OF  
CORRECTION, et al.,  
  
DEFENDANTS.

Case No.

MOTION FOR APPOINTMENT  
OF COUNSEL

COMES NOW, ADREE EDMO, Plaintiff in above entitled matter moves this Honorable Court to GRANT Plaintiff's MOTION FOR APPOINTMENT OF COUNSEL, for the reasons more fully set forth herein PLAINTIFF'S AFFIDAVIT OF SUPPORT IN MOTION FOR APPOINTMENT OF COUNSEL and PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR APPOINTMENT OF COUNSEL.

1. Plaintiff is currently incarcerated within the Idaho Department of Correction ("IDOC") under direct care, custody and control of Warden Howard Kieth Yordy at the Idaho State Correctional Institution ("ISCI").

2. The issues to be presented in this matter may become complex and complicated due to medical and legal theories far reaching beyond Plaintiff's ability and resources available to her in a prison facility.

3. The issues presented in this matter also require the ability to investigate the facts extensively, requiring access to computer generated/stored information, e.g., medical databases, emails, electronic formats, etc. This case presents the need of extensive documentary discovery, depositions of prison officials, and expert witnesses outside the prison within the community.

4. The Plaintiff's indigent ability to present issues herein case as she is not an experienced jailhouse lawyer, nor does she have access to resources to conduct adequate legal research of case law to resent herein issues.

5. The complexity and difficulty of this case, specifically, access to Plaintiff's medical records in which Plaintiff would need representation to acquire such records, as well as a trained medical professional to explain the medical terminology and a medical expert to explain the medical issues herein.

6. The above burden placed on Plaintiff would not allow Plaintiff to present this case as equally compared to the trained Counsel of the State of herein matter.

DATED This 30<sup>th</sup> day of March, 2016.

A. Admo 04/06/2017 AE  
ADREE EDMO, PLAINTIFF

CERTIFICATE OF SERVICE

I, ADREE EDMO, CERTIFY, I mailed a true and correct copy of the foregoing MOTION FOR APPOINTMENT OF COUNSEL, for the purposes of filing with the Court via the ISCI Offender Mailing Procedures to the address listed below:

X U.S. DISTRICT COURT  
JAMES A. MCCLURE FEDERAL BUILDING  
550 WEST FRONT STREET  
BOISE IDAHO 83704

*Adredmo* *03/30/2017* *AG*  
*04/06/2017*  
ADREE EDMO, PLAINTIFF

Case No: \_\_\_\_\_ Inmate Name: Adree Edmo  
Date: 04/06/2017 Inmate IDOC#: 94691  
Document Title: Plaintiff's Memorandum of Law For  
Appointment of Counsel  
Total Pages: 6 Inmate Initials Verifying Page Count: AG  
Document(s) 1 of 6

Adree Edmo  
IDOC 94691  
ISCI/BHU 16  
P.O.BOX 14  
Boise, Idaho 83707-0014  
Plaintiff, Pro Se.

UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF IDAHO

ADREE EDMO,  
PLAINTIFF,

v.

IDAHO STATE BOARD OF  
CORRECTION, et al.,  
DEFENDANTS.

Case No. \_\_\_\_\_

PLAINTIFF'S MEMORANDUM  
OF LAW FOR APPOINTMENT  
OF COUNSEL

A. STATEMENT OF THE CASE

1. This is a civil rights case filed under 42 U.S.C. Section 1983 by a state prisoner and asserting claims for un-constitutional denial of medical care resulting from Plaintiff's serious medical condition.

2. The Plaintiff seeks damages as to all claims and an injunction to ensure proper medical treatment.

B. STATEMENT OF THE FACTS

3. The Complaint alleges that the Plaintiff was diagnosed with a serious medical condition Gender Identity Disorder ("GID") (Compl. at 3, Affidavit of Adree in Support of Civil Rights Complaint at 44).

4. Plaintiff has been provided cross-sex hormonal therapy of female hormones and testosterone suppressants for the feminizing effects it has on the body. (Aff. Adree Edmo Supp.

of Civ. Rights Compl. at 52,53)

5. Plaintiff alleges that cross-sex hormonal treatment and the mood management process group of "Gender Identity Disorder Process Group," had not been adequate medical care for her GID. (Aff. Adree Edmo Supp. of Civ. Rights Compl. at 65)

6. The Complaint alleges that the medical providers knew of and/or know of the appropriate Standard of Care used when treating GID and refused to treat accordingly. (Aff. Adree Edmo of Supp. of Civ. Rights Compl. at 29)

7. The Complaint alleges that non-medical staff and Defendants do not and continually denial Plaintiff with reasonably adequate medical care services at a level reasonably commensurate with modern medical science and of a quality acceptable within prudent official standards. (Compl. at )

C. ARGUMENT

THE COURT SHOULD APPOINT COUNSEL FOR THE PLAINTIFF

8. In deciding whether to appoint counsel for an indigent litigant, the Court should consider, "the factual complexity of the case, the ability of the indigent to investigate the facts, the existence of conflicting testimony, the ability of the indigent to present his claim and the complexity of the legal issues." Abdullah v. Gunter, 949 F.2d 1032, 1035 (8th Cir. 1991)(citations omitted), cert. denied, 112 S.Ct. 1995 (1992)

9. In addition, courts have suggested that the most important factor is whether the case appears to have merit. Carmona v. U.S. Bureau of Prisons, 243 F.3d 629, 632 (2d. Cir. 2001)

10. Each of these factors weighs in favor of appointment of counsel in this case.

11. **Factual Complexity.** The Plaintiff alleges the denial of medical care for the Plaintiff's serious medical condition. The sheer number of claims and defendants makes this a factually complex case.

12. In addition, Plaintiff's claims involve medical care and the denial of medical care; it will probably be necessary to present a medical expert witness to cross-examine medical witnesses called by the defendants, or both. The presence of medical claims and other issues requiring expert testimony supports appointment of counsel. Montgomery v. Pinchak, 294 F.3d 492, 503-04 (3d.Cir.2002); Moore v. Mabus, 976 F.2d 268, 272 (5th Cir. 1992); Jackson v. County of McClean, 953 F.2d 1070, 1073 (7th Cir.1992).

13. **The Plaintiff's ability to investigate.** The Plaintiff is not able to investigate the facts necessary to this case. For example, Plaintiff is only allowed to view her medical record one time during one month period. She has no medical education as to the medical terminology. She is also subject to be moved to a different institution deemed appropriate. Plaintiff is in the same situation with regard to developing the facts as an inmate who has been transferred to a different institution, a factor several courts have cited in appointing counsel. Tucker v. Randall, 948 F.2d 288, 291-92 (7th Cir.1991); Gates v. Coughlin, 679 F.Supp. 270, 273 (W.D.N.Y. 1988).

14. Furthermore, this case will require considerable discovery concerning the identity of witnesses, the officer's reports, and statements about the injury incident and the Plaintiff's medical history. See Purham v. Johnson, 126 F.3d 454, 459 (3d.Cir. 1997)(holding counsel should have been appointed because of "prisoner's lack of legal experience and complex discovery rules clearly put him at a disadvantage in countering defendant's discover tactics... these [discovery rules] prevented [Plaintiff] from presenting an effective case below.")

15. **Conflicting Testimony.** Plaintiff's account on her medical treatment are squarely in conflict of medical provider's and other medical personnel. The existence of credibility issues supports the appointment of counsel. Steele v. Shah, 87 F.3d 1266, 1271 (11th Cir. 1996); Gatson v. Coughlin, 679 F.Supp. at 273.

16. **The ability of the indigent to present her claim.** The Plaintiff is an indigent prisoner with no legal training, a factor that supports the appointment of counsel. Forbes v. Edgar, 112 F.3d 262, 264 (7th Cir. 1997), In addition, she is confined with very limited access to legal materials. Rates v. Johnson, 969 F.2d 700, 703-04 (8th Cir. 1992)(citing lack for ready access to law library as a factor supporting appointment of counsel.) (internal citations omitted),

17. **Legal Complexity.** The large number of officials, some of whom are supervisory officials, presents complex legal issues of determining which defendants were sufficiently involved in

the constitutional violations to be liable. Hendricks v. Coughlin, 114 F.3d 390, 394 (2d.Cir. 1997)(holding complexity of supervisory liability supported appointment of counsel)(internal citations omitted).

18. In addition, the Plaintiff has asked for jury trial, which requires much greater legal skill than the Plaintiff has or can develop. Solis v. County of Los Angeles, 514 F.3d 946, 958 (9th Cir. 2009).

19. **Merit of the case.** The Plaintiff's allegations, if proved, would clearly establish a constitutional violation.

20. The allegations of denial of medical care amount to "intentionally interfering with the treatment once prescribed," which the Supreme Court has specifically cited as an example of unconstitutional deliberate indifference to prisoner's medical needs. Estelle v. Gamble, 429 U.S. 97, 105, 97 S.Ct. 285 (1976).

21. Furthermore, denial of female undergarments and denial of access to female commissary hygiene and cosmetics for an individual diagnosed with GID is deliberate indifference to treat a serious condition. Konitzer v. Frank, 711 F.Supp. 2d. 874, 908-11 (E.D.Wis.2010); Soneeya v. Spencer, 851 F. Supp. 2d. 228, 248 (D.Mass. 2012). On it's face, then, this is a meritorious case.

22. CONCLUSION

For the foregoing reasons, the Court should grant the Plaintiff's motion and appoint counsel.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2016.

*A Edmo*

ADREE EDMO, PLAINTIFF, PRO SE.

CERTIFICATE OF MAILING

I, ADREE EDMO, CERTIFY I mailed a true and correct copy of the foregoing, PLAINTIFF'S MEMORANDUM OF LAW FOR APPOINTMENT OF COUNSEL, for the purposes of filing with the Court via the ISCI Offender Mailing Procedures to the address listed below:

U.S. DISTRICT COURT  
JAMES A. MCCLURE FEDERAL BUILDING  
550 WEST FRONT STREET  
BOISE, IDAHO 83704

*A Edmo*

ADREE EDMO, PLAINTIFF, PRO SE.

*04/06/2017 AG*

*~~03/30/2017~~*

DATE

Adree Edmo  
IDOC 94691  
ISCI/BHU Unit 16  
P.O. BOX 14  
BOISE IDAHO 83707-0014

Case No: \_\_\_\_\_ Inmate Name: Adree Edmo  
Date: 04/06/2017 Inmate IDOC#: 94691  
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14 Motion for Appointment of Counsel  
Total Pages: 14 Inmate Initials Verifying Page Count: \_\_\_\_\_  
Document(s) 1 of 14 RE

UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF IDAHO

ADREE EDMO,  
PLAINTIFF,  
v.  
IDAHO STATE BOARD OF  
CORRECTIONS, et al.,  
DEFENDANTS.

Case No.  
  
PLAINTIFF'S AFFIDAVIT  
IN SUPPORT OF MOTION  
FOR APPOINTMENT OF  
COUNSEL

STATE OF IDAHO )  
  )SS  
COUNTY OF ADA )

ADREE EDMO, after first being duly sworn upon her oath,  
deposes and says as follows:

1. I am over eighteen (18) years of age, competent to testify to the matters herein, as I am the Plaintiff in the above entitled matter, and depose the following to be correct and true to my belief.
2. I am currently residing at the Idaho State Correctional Institution ("ISCI") in Boise Idaho, under the care, custody and control of ISCI Warden Howard Kieth Yordy.
3. As such that I am incarcerated I am not afforded the right to be housed at any particular institution allowing the possibility that I could be further restrained from getting

adequate legal help from law books and/or from contacting an attorney for legal assistance in a timely manner, and so as long as security permits.

4. I am impoverished, unlettered and do not have any funds to hire private counsel. I am an enrolled tribal member of the Shoshone-Bannock Tribes ("Sho-Ban Tribes") of the Fort Hall Indian Reservation located in Fort Hall Idaho. I receive a bi-annual tribal per capita of the Sho-Ban Gaming Revenue which usually is below \$1200.00 dollars. slightly less. This is my sole income.

5. I am not given any more income from family and/or friends, and I provide for myself and my boyfriend who is currently incarcerated as well.

6. I do not have the income to compete with the State's Counsel.

7. I am not trained extensively in the law, legal theories about the matters complained of in my complaint, I do not have knowledge of medical terminology used in my medical records and or used in my diagnosis of Gender Identity Disorder ("GID").

8. I am not trained in the law to present adequate legal issues that would survive competing with trained and competent licensed Counsel of the State.

9. I do not fully understand the provisions of medical unconstitutional violations and how to fully present these violations.

10. I have attempted to obtain Counsel by submitting letters for legal assistance to the law firms and/or attorneys as follows and attached hereto as EXHIBIT A-LETTER FOR LEGAL ASSISTANCE.

Jones and Swartz, PLLC  
1673 W. Shoreline Dr., Ste. 200  
P.O. BOX 808  
Boise, ID 83707-7808  
(208) 489-8989

Rossman Law Group  
737 N. 7th Street  
Boise, ID 83701  
(208) 922-6114

Nevin, Benjamin and McKay, LLP  
303. W. Bannock  
P.O. BOX 2772  
Boise, ID 83701

National Center for Lesbian Rights  
870 Market Street, Suite 370  
San Francisco, CA 94102

Idaho State Bar Lawyer Referral Service  
P.O. BOX 895  
Boise, ID 83701-0895  
(208) 334-4500

11. The only legal assistance offered to me and offenders in ISCI are the Self-Help Legal Assistance books, with the case law cited in these self-help manuals which may not directly address my issue at hand.

12. I do not have access to legal research databases, such as NEXIS-LEXIS, and/or WESTLAW or online computer research services.

13. I do not have medical knowledge and/or experience of interpreting my medical records accurately.

14. I am further handicapped by not being allowed to access any documents or policies, procedures, allowed by non-offenders and only allowed policies, and/or procedures specifically designated for offender use.

15. As I am an offender I am subject to being transferred to another facility with potential for causing my case to become moot in these matters. I would not be able to defend my case appropriately and timely.

16. Furthermore, it is the policy and procedure of ISCI to allow a one time, per one business week, offenders to check out self-help manuals. This can further delay my timely responses.

WHEREFORE, I, ADREE EDMO, respectfully pray that this Honorable Court issue it's Order GRANTING PLAINTIFF'S MOTION FOR APPOINTMENT OF COUNSEL to represent my interest, or in the alternative grant any such relief to which it may appear I am entitled to.

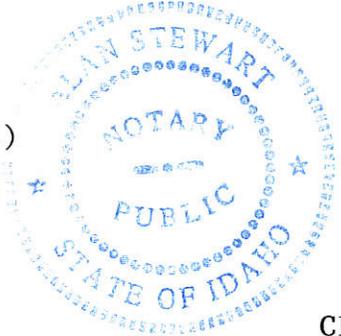
DATED This 30<sup>th</sup> Day of March 2017 ~~2016~~ JE

Adree Edmo  
ADREE EDMO, PLAINTIFF

*Mason Edmo AKA Adree Edmo*

SUBSCRIBED AND SWORN Before Me On This 6 Day of April, 2016.

(S E A L)



[Signature]  
Notary Public for Idaho  
Commission Expires 8/14/2020

CERTIFICATE OF SERVICE

I, ADREE EDMO, CERTIFY, I, mailed a true and correct copy of PLAINTIFF'S AFFIDAVIT IN SUPPORT OF MOTION FOR

# EXHIBIT A

Documents 1-5

Plaintiff's Affidavit  
in Support of Motion  
for Appointment of  
Counsel

January 31, 2014

Jones & Swartz, PLLC  
1473 W. Shoreline Dr., Ste. 200  
P.O. Box 7808  
Boise, ID 83707-7808  
(208) 489-8989

Re: Representation on Civil Rights  
Case.

Dear Jones & Swartz:

My name is Adree Edmo, I am a transgender/transsexual female currently incarcerated in the Idaho Department of Corrections at the Idaho State Correctional Institution here in Boise.

I am inquiring legal representation for violation of my civil Rights. I am being denied adequate medical treatment of my transgender/transsexualism of sex reassignment surgery and commonly used medical protocols to treat this condition. As a result,

(1)

EX-A-1

January 31, 2016

Rossman Law Group, PLLC  
737 N. 7th Street  
Boise, ID 83701  
(208) 922-1614

Re: Representation on Civil Rights  
Case

Dear Rossman Law Group,

My name is Adree Edmo, I am a transgender/transsexual female currently incarcerated in the Idaho Department of Corrections at the Idaho State Correctional Institution here in Boise.

I am inquiring legal representation for violation of my Civil Rights. I am being denied adequate medical treatment of my transgender/transsexualism of sex reassignment surgery, and commonly used medical protocols to treat this condition. As a result, I have attempted to castrate myself

(1)

EX. A-2

February 02, 2016

Nevin, Benjamin & McKay, LLP  
303. W. Bannock  
P.O. Box 2772  
Boise, ID 83701

Dear Nevin, Benjamin & McKay, LLP;

My name is Adree Edmo, a transsexual female currently incarcerated within the Idaho Department of Corrections at the Idaho State Correctional Institution at Boise, Idaho.

I am inquiring legal representation due to IDOC's denial of sex reassignment surgery for my GID. As a result, I have attempted to castrate my testicles with a razor blade requiring sutures.

I have exhausted my administrative remedies pursuant to the Prison Litigation Reform Act (PLRA) requirements,

I would like to request legal representation from your firm if at all possible.

(1)

Ex. A-3

February, 02 2016

National Center for Lesbian Rights  
870 Market Street, Suite 370  
San Francisco, CA 94102

Dear NCLR,

My name is Adree Edmo and I am a transsexual ~~to~~ female incarcerated within the Idaho Department of Corrections (IDOC) at the Idaho State Correctional Institution in Boise Idaho.

I am inquiring for legal representation due to IDOC's denial of sex reassignment surgery. As a result of denial, I have attempted to castrate/sever my testicles with a razor blade.

I have exhausted my administrative remedies pursuant to the Prison Litigation Reform Act (PLRA) requirements for such issues ~~and~~ as well as others. I have no remedy other than legal action.

I would like to speak to any of your

(1)

EX. A-4

February 02, 2016

Gay/Lesbian Advocates and  
Defenders (GLAD)  
30 Winter Street, Suite 800  
Boston, MA 02108

Dear GLAD,

My name is Adree Edmo, a transsexual female incarcerated within the Idaho Department of Corrections at the Idaho State Correctional Institution at Boise Idaho.

I am inquiring for legal representation due to IDOC's denial of sex reassignment surgery. As a result of denial, I have attempted to castrate/ sever my testicles with a razor blade and needed sutures.

I have exhausted my administrative remedies pursuant to The Prison Litigation Reform Act (PLRA) requirements of this issue as well as others. I have no remedy other than legal action.

I would like to speak to any of your

EX-A-5



30 Winter Street  
Suite 800  
Boston, MA 02108  
P 617.426.1350  
F 617.426.3594  
www.glad.org

February 8, 2016

Adree Edmo #94691  
ISCI Unit 16  
PO Box 14  
Boise, ID 83707

Dear Adree Edmo,

Thank you for contacting GLAD about your situation within IDOC. Our staff attorney who leads our trans issues project is going to look over your letter, though she may not have the capacity to take your case, especially as you are outside our usual service area of New England.

While we look over your letter, I have a couple of suggestions for other organizations that may be able to help you.

The National Center for Lesbian Rights has handled similar cases in the past, and I'm including a printout of one of them. You can contact them by writing the address that I've highlighted on that printout.

The Transgender Law Center's Detention Project, which helps trans people in prison and other forms of detention, may be able to help you. They have a collect call line for incarcerated people who want to contact them, 510-380-8229, and their address is 1629 Telegraph Avenue, Suite 400, Oakland, CA 94612

Lambda Legal is similar to GLAD, but quite a bit larger and covering the whole country. You can write their Western Regional Office at 3325 Wilshire Blvd, Suite 1300, Los Angeles, CA 90010-1729.

The ACLU of Idaho may also be able to help. I've enclosed a copy of their prisoner intake form.

I hope these are helpful, and we will let you know if we can take your case.

With best regards,

Jessie

GLAD Answers Volunteer

*Through strategic litigation, public policy advocacy, and education, Gay & Lesbian Advocates & Defenders works in New England and nationally to create a just society free of discrimination based on gender identity and expression, HIV status, and sexual orientation.*



Contact Us (<http://www.nclrights.org/about-us/contact-us/>) Press Room (<http://www.nclrights.org/press-room/>) Sign Up for NCLR's Email Updates  
300 Winter Street  
Suite 800  
Boston, MA 02108  
P 617.426.1350  
F 617.426.3594  
[www.glad.org](http://www.glad.org)

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# Case Summary & History

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[Full Policy & Legislation List \(/cases-and-policy/full-policy-and-legislation-list/\)](/cases-and-policy/full-policy-and-legislation-list/)

Healthcare  
**Case: Gammett v. Idaho State Board of Corrections**  
STATUS: Victory, Idaho

Jennifer Spencer served a 10-year prison sentence for possession of a stolen car and a failed escape attempt that occurred when she was a teenager. While she was incarcerated in Idaho, Spencer, a transgender woman, made 75 requests for treatment for her gender identity disorder (GID), but the Idaho Department of Corrections (IDOC) failed to provide her with any appropriate care. Spencer attempted suicide when she learned that prison doctors would not provide any treatment and eventually removed her own genitals using a disposable razor blade, nearly bleeding to death in the process. On July 27, 2007, Judge Mikel Williams of the Federal District Court for the District of Idaho ruled that, based on extensive expert medical testimony, Spencer is entitled to receive female hormone therapy while her case is being decided. Judge Williams held that "gender identity disorder, left untreated, is a life-threatening mental health condition." On September 7, 2007 Judge Williams denied a motion for reconsideration and again held that Spencer must receive hormone therapy. Jennifer started receiving appropriate counseling and hormone treatment in Fall 2007. Because there are so few decisions addressing this important issue, this is a tremendous victory that may pave the way for other transgender prisoners who are being denied medically necessary care.

LEARN MORE  
**Read the Press Release 7.30.2007**  
[\(http://www.nclrights.org/press-room/press-release/federal-judge-in-idaho-orders-treatment-for-transgender-inmate/\)](http://www.nclrights.org/press-room/press-release/federal-judge-in-idaho-orders-treatment-for-transgender-inmate/)

In July 2009, the case settled to the satisfaction of all parties. Jennifer was released from prison in late 2009.

SEARCH COURT CASES  
Keyword  
Topic

NCLR's co-counsel were Sheryl Musgrove, Morrison & Foerster LLP, and the Idaho firm of Stoel Rives, LLP.  
↓  
101 S. Capitol Blvd, Suite 1900 Boise, ID 83702-7705  
↓  
425 Market St San Francisco, CA 94105-2482

**NATIONAL HEADQUARTERS**  
870 Market Street, Suite 370  
San Francisco, CA 94102  
Phone: 415.392.6257  
Fax: 415.392.8442

**WASHINGTON, DC OFFICE**  
1100 H Street, NW  
Suite 540  
Washington, DC 20005  
Phone: 202.734.3545

**LEGAL HELP LINE**  
1.800.528.6257 or  
415.392.6257

**RESOURCES**  
Resources  
[\(http://www.nclrights.org/legal-help-resources/\)](http://www.nclrights.org/legal-help-resources/)  
Legal Help  
[\(http://www.nclrights.org/legal-help/\)](http://www.nclrights.org/legal-help/)  
Our Blogs  
[\(http://www.nclrights.org/our-blogs/\)](http://www.nclrights.org/our-blogs/)

**SEARCH**  
Search Cases & Policy  
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**PRESS ROOM**  
[\(HTTP://WWW.NCLRIGHTS.ORG/PRESS-ROOM/\)](http://www.nclrights.org/press-room/)  
Press Releases & Statements  
[\(http://www.nclrights.org/press-room/\)](http://www.nclrights.org/press-room/)  
About Us (<http://www.nclrights.org/about-us/>)

**CONTACT US**  
Complete Contact List  
[\(http://www.nclrights.org/about-us/staff/\)](http://www.nclrights.org/about-us/staff/)

**SUPPORT THE FIGHT FOR JUSTICE**  
Give (<http://www.nclrights.org/give/>)  
Shop NCLR  
<http://www.cafepress.com/nclrights>

NCLR is a 501(c)(3) non-profit organization, and our federal tax identification number is 94-3086885.

**SIGN UP FOR EMAIL**  
Your email address

**CONNECT ONLINE**

05/11/16

Page 1

Idaho State Bar Lawyer Referral Service  
P.O. Box 895  
Boise, ID 83701-0895  
(208) 334-4500

Re: Legal Assistance

To whom it may concern:

I am seeking an Idaho attorney to represent me in a civil Rights lawsuit.

I am a transgender woman ~~showered~~ housed at the Idaho State Correctional Institution in Boise.

I am being denied medical care for my diagnosis of gender identity disorder (GID) and punished for my diagnosis of EID.

Recently, I had attempted to castrate my testicles because of my EID.

Idaho Department of Correction (IDOC) officials continue to deny me treat-



May 16, 2016

Adree Edmo #94691  
ISCI HU 16  
PO BOX 14  
Boise, ID 83707

Dear Adree,

Unfortunately we do not have listings for prisoner rights and violation thereof.  
Please contact the entities below.

**Department of Justice**  
950 Pennsylvania Ave, NW  
Washington, DC 20530  
[www.usdoj.gov](http://www.usdoj.gov)  
(202) 514-2000

**ACLU of Idaho**  
PO Box 1897  
Boise, ID 83701  
(208) 344-9750

**Human Rights Commission**  
1109 Main Street, Suite 400  
Boise, ID 83720  
(208) 334-2873

Sincerely,

Idaho State Bar Lawyer Referral Service