

In The United States District Court
For The Southern District of Illinois

Cristina Nichole Iglesias, AKA -)
Cristian Noel Iglesias,)
Federal Register # 17248-018)
Plaintiff,)

Case No. # 3:19-cv-00415-JPG

VS.)

Ian Connors, et al)
Defendants)

Response by Plaintiff to the Defendant
Dr. Kathleen Hawk Sawyer to Dismiss, Alternatively,
To Enter Summary of Judgement. to Count 5
of the Plaintiff's Complaint.
Motion by Plaintiff to dismiss Count 5 of
her Complaint without Prejudice and enter a
summary of Judgement in favor of Defendant
Dr. Kathleen Hawk Sawyer as to Count 5
ONLY.

Comes now Plaintiff, Cristina Nichole Iglesias,
AKA, Cristian Noel Iglesias, files this Response to the
Defendants Motion to dismiss Count 5 of Plaintiff's
Complaint. (Rehabilitation Act Claims.) Plaintiff
who is Pro Se and was not aware that she
needed to file and Exhaust her Administrative -

- Remedy to the Rehabilitation Act due to being denied reasonable accommodations to a serious disability by the Bureau of Prisons due to being forced to live as an "outwardly" man even though Bureau of Prisons knows Plaintiff is a transsexual / transgender female with a diagnosis of Gender Dysphoria.

The Bureau of Prisons has denied her Request to be transferred to a female Prison twice and Plaintiff has exhausted her Administrative Remedies on that issue 2 X, has asked the Bureau of Prisons to Change Sentry (Gender Marking's) from male to female to accommodate her disability of Gender-Dysphoria which she has exhausted her Administrative Remedy for that. I am a transgender inmate identified in SENTRY as such. All denied by the Bureau of Prisons. Plaintiff, hereby also states that as follows, Plaintiff has repeatedly requested that the Bureau of Prisons treat her a her -

- identifying Gender even on Administrative - Remedies to be denied and to have the B.O.P change her Gender markers from male to female in SENTRY denied on Administrative - Remedies.

The Bureau of Prisons refuses to accommodate her.

Plaintiff even has filed due to her severe Gender Dysphoria to have the Gender Affirming Surgeries to stop the "excruciating pain" and "suffering" and "torture" and continues to be delayed and hindered along the way by the Bureau of Prisons, she has filed 2 - Administrative Remedies for that, 1 - denied

1 - was told by Jan corners on 3/2/18 on Administrative Remedy I would be notified, still on 6/11/19 Dr. Pass clinical Director USP-marion stated that Central Office has offered no guidance on how, where, or when the surgery will be done. went to sick call on 9-23-19 again to Request Gender Affirming surgery, waiting on the TEC to make a decision, just delay after delay and the B.O.P keeps the "Status Quo" delay, hinder and stall.

- Staff Plaintiff, in the meantime she continues to suffer "Irreparable Harm" and "Medical Deliberate-Indifference" as the "excruciating pain and suffer" she contends with even as staff are aware that she has severe Gender Dysphoria and staff are aware she qualifies for surgery and that surgery would help her tremendously and stop the "Pain & suffering" staff continue the Delay, Hindrance, Interference and cause Plaintiff to have distress, Anxiety, bouts of depression, thoughts of Auto-Castration, which Plaintiff did cut herself before. This is a clear violation of the "Deliberate Indifference" clause to a serious medical need of Prisoners constitutes the "unnecessary and wanton infliction of Pain" Proscribed by the 8th Amendment. Plaintiff will move this Court to Dismiss Count (5) of her complaint ONLY, as she did not file the Administrative Remedy on the Rehabilitation Act without Prejudice and enter summary of Judgment to Defendant Dr. Kathleen Hawk Sawyer ONLY. Plaintiff also moves this Court for such an order, that Count (1) is valid. (ongoing), against Ian Connors.

Respectfully,

 Cristina N. Iglesias
 17248-018

Cristian Iglesias #17248-018
United States Penitentiary - Marion
P.O. Box - 1000
Marion, Illinois 62959

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Thinking of you

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↔ 17248-018 ↔

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United States Penitentiary
Marion, IL 62959

Date: OCT 01 2019

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