

United States District Court
For The Southern District of Illinois

Cristina Nichole Iglesias (A.K.A -
Cristian Noel Iglesias)
Plaintiff,

VS.

) Case NO: 03:19-cv-00415-JPE
)
)

Ian Connors, et al,
Defendants.
)
)
)

Motion To Amend Complaint / Preliminary Injunction
filed by Plaintiff.

Comes Now, Cristina Nichole Iglesias, (A.K.A -
Cristian Noel Iglesias) Plaintiff, files Prose, motion -
To Amend Complaint / Preliminary Injunction to add
the Federal Bureau of Prisons as a Defendant
in "official Capacity".

Plaintiff, contends that Ian Connors alone cannot
be ordered to carry out gender reassignment surgery,
laser hair removal (facial) and transfer to a female
Prison. Ian Connors, merely answers the final step in
the Bureau of Prisons Administrative Remedy
Program (Central Office Appeals) in compliance
with the P. L. R.A.

Plaintiff, filed complaint seeking Warden True, Ian Connors, Deborah Schult, Alix Mclearen, Donald Trump and John Does # 1-10, for constitutional violations of Plaintiff rights mainly 8th Amendment "Medical Deliberate Indifference" under *Bivens v. Six Unknown Named Agents*, 403 U.S. - 388 (1971).

This Court having Jurisdiction, Plaintiff has been at United States Penitentiary Marion since 6-12-17. Plaintiff has exhausted All Administrative-Remedy's available to her § under the P.L.R.A. Plaintiff suffers daily great "excruciating § - emotional pain" due to having "severe" Gender-Dysphoria. Plaintiff suffers greatly due to the severe Gender Dysphoria because she cannot complete her existence as a woman. Plaintiff has been on continuous hormone therapy since 2015 and has been in Psycho therapy since 2015. Plaintiff, is suffering greatly by the Federal Bureau of Prisons not affording her gender affirming Surgery.

Plaintiff has exhausted Administrative Remedies and other avenues like Request to staff and at Chronic Care visits to receive the only treatment that will help alleviate her suffering, "gender affirming surgery."

Hormone therapy and psychotherapy alone is not enough to stop her pain and suffering which causes Plaintiff great anxiety, thoughts of Auto-castration as well as agony at the frustration with the unknown help not being given by the Bureau of Prisons.

Plaintiff's, gender dysphoria is a serious medical need and Plaintiff has met all criteria by WPATH and the Bureau of Prisons still hinders -

her surgery. Plaintiff has met all criteria for severe Gender Dysphoria as well as gender affirming surgery.

Plaintiff, agrees with the U.S. Government's Response that Defendant Ian Connors should not be alone responsible for Plaintiff's suffering & pain, and delay or hinderance in providing adequate medical including access to gender affirming surgery, under 28 C.F.R Plaintiff is in the custody of the Federal Bureau of Prisons by Judgement & Commitment. That alone says Federal Bureau of Prisons in the "official capacity" should be added on the Complaint & Preliminary Injunction as Defendant's.

Plaintiff, who is still waiting for relief from the Federal Bureau of Prisons and continues to suffer by the Federal Bureau of Prisons,

Because of the "Medical Deliberate Indifference" by the Federal Bureau of Prisons continues to delay or hinder gender affirming surgery causing unwanted infliction of Pain, which violates the 8th Amendment. Bureau of Prisons Staff are aware of my Pain and suffering and fail to provide care that would offer help to Plaintiff's severe gender dysphoria, which has been left untreated and causes Plaintiff "Irreparable Harm" daily.

Therefore, Plaintiff hereby Request that the Federal Bureau of Prisons be added in "Official Capacity" ~~on~~ Plaintiff's Complaint & Preliminary Injunction with IAN Connors, Director Kathleen Newk-Savage and Alix Mclearen in "Official Capacity" (Individual).
The T.E.C.

Plaintiff, moves this Court to add the Federal Bureau of Prisons in "Official Capacity" to Plaintiff's complaint & Preliminary Injunction.

Plaintiff also moves this Court keep Ian Connors and Director of the Federal Bureau of Prisons as defendants as well in their "Individual Capacity" and order the Defendants served.

Respectfully,


Cristina Iglesias

Date: 10-31-19

Cristian N. Iglesias #17248-018
United States Penitentiary - Marion
Post Office Box - 1000
Marion, Illinois 62959-1000



MAIL DELIVERED
US MAIL MAILS

⇔ 17248-018 ⇔
United Sta District Court
** Clerks Office **
750 Missouri AVE
E Saint Louis, IL 62201
United States

Legal

Mail X



The enclosed letter may be transmitted by
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 SOUTHERN DISTRICT OF ILLINOIS
 EAST ST. LOUIS OFFICE

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Exhibit W

W-1 - Electronic Request to Staff filed by Plaintiff to Health Svcs on - ~~10~~-4-2017.

W-2 - Attorney James B. Craven III, (4) Pages to Kathleen M. Kenney, Esquire, Asst. Director & General Counsel Federal Bureau of Prisons in regards to Plaintiff.

W-3 - Article by Black & Pink Newsletter (1-) Page, in L.G.B.T.Q Newsletter.

W-4 - (1-) Page, Letter to Plaintiff from the Northwest-Network, an L.G.B.T.Q Advocacy office, (James) advising requirements for Plaintiff to be considered for female prison. (Domestic Violence Organization for L.G.B.T.Q which also advocates for L.G.B.T.Q Prisoners.

From: MAR/InmateToHealthSvcs
To: ^!CRISTIAN NOEL ^!IGLESIAS
Date: 10/4/2017 1:22 PM
Subject: 5ed71157-9de0-4bc4-a7b5-f7746d4b3577

There is currently not a guideline on the approval of reassignment surgery in the Federal Bureau of Prisons and this surgery is currently not approved nationally in the Bureau of Prisons.
Thank you,

Caleb Meyer APRN-CNP, MSN, CCHP
Lieutenant Commander U. S. Public Health Service
USP Marion

>>> ~^!IGLESIAS, ~^!CRISTIAN NOEL" <17248018@inmatemessage.com> 10/2/2017 11:33 AM >>>
To: Dr.Pass/Request-10/2/17
Inmate Work Assignment: PM Rec

ATTENTION

Please cut and paste the message indicator below into the subject line; only this indicator can be in the subject line.

5ed71157-9de0-4bc4-a7b5-f7746d4b3577

Your response must come from the departmental mail box. Responses from personal mailboxes WILL NOT be delivered to the inmate.

Inmate Message Below

I am writing this Request to Staff to Officially Request in writing the Sexual Reassignment Surgery [Gender Affirming Surgery]. I am qualified under the guidelines of WPATH and the Clinical Practitioners Guidance from the BOP December 2016. Please let me know, I have gone to sick call 2X last month requesting the surgery. I am a transgender woman and by the BOP refusing me this treatment causes me great stress, anxiety, and depression and sadness. Thank you.

CC-FILE/C.N.I # 17248-018
Copies sent to Transgender Law Center/Attorney -Ilona Turner
** Printed 10/1/17 **

JAMES B. CRAVEN III

ATTORNEY AT LAW

JANIE K. LATTA
LEGAL ASSISTANT

LIBERTY MARKET BUILDING
349 WEST MAIN STREET
P. O. BOX 1366
DURHAM, NC 27702
(919) 688-8295
FAX (919) 688-7832
jbc04@mindspring.com

December 1, 2016

Kathleen M. Kenney, Esquire
Assistant Director and General Counsel
Federal Bureau of Prisons
320 First Street, NW-Suite 654
Washington, DC 20001

Re: Christian Iglesias
Reg. No. 17248-018

Dear Kathy:

Christian Iglesias, now Christina Iglesias, is a transgender (male to female) guest at FCI Butner, and is acknowledged there as transgender. Her release date is April 26, 2023. Can we not get her transferred to a women's facility, e.g. FCI Dublin, California, as Vanessa Adams was? Please let me know.

I never gave this issue much thought until five or six years ago when I reconnected after 50 years with an old Naval Academy shipmate, then Victor Gray '62, now Victoria Gray, the only woman with a Bronze Star for valor and a Purple Heart from the Mekong Delta. And, I might add, a dear friend with a hell of a story.

Many thanks.

Very truly yours,



James B. Craven III

JBCIII/jkl

Cc: Ms. Christina Iglesias
Ms. Kate Selby

JAMES B. CRAVEN III
ATTORNEY AT LAW

JANIE K. LATTA
LEGAL ASSISTANT

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jbc64@mindspring.com

December 20, 2016

Kathleen M. Kenney, Esquire
Assistant Director and General Counsel
Federal Bureau of Prisons
320 First Street, NW-Suite 654
Washington, DC 20001

Re: Christian Iglesias
Reg. No. 17248-018

Dear Kathy:

Christine Iglesias was sexually assaulted by another BOP guest last week and has been placed in the SHU for her own safety. She is terrified of being on the compound, and does not deserve being in the SHU as the victim of the offense. The sooner we can get her to a womens' facility, the better. That was done for Vanessa Adams, Reg. No. 11207-112, now at FCI Dublin. See also Adams v. Federal BOP, No. 1:09 CV 10272 (D. Massachusetts). Surely it won't take litigation to get Christine Iglesias transferred too. Please let us know.

Many thanks.

Very truly yours,



James B. Craven III

JBCIII/jkl

Cc: Ms. Christine Iglesias
Ms. Kate Selby
Mr. Forest Armstrong

JAMES B. CRAVEN III

ATTORNEY AT LAW

JANIE K. LATTA
LEGAL ASSISTANT

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DURHAM, NC 27702
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jbc64@mindspring.com

December 27, 2016

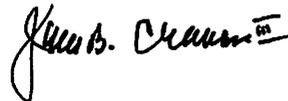
Ms. Christina Iglesias
Reg. No. 17248-018
Box 1000 FCI
Butner, NC 27509

Dear Christina:

Thanks for your December 20 letter. I am sorry and shocked, but not surprised you are being treated as you are there at the FCI. That said, it is inexcusable. As I have noted before though, all I can do for you is to bring this to the attention of the BOP hierarchy in Washington and ask that you be transferred ASAP to FCI Dublin, California.

Take care and God bless.

Very truly yours,



James B. Craven III

JBCIII/jkl

Cc: Kathleen M. Kenney, Esquire
Ms. Kate Selby

JAMES B. CRAVEN III

ATTORNEY AT LAW

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LEGAL ASSISTANT

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FAX (919) 688-7832
jbc64@mindspring.com

February 21, 2017

Kathleen M. Kenney, Esquire
Assistant Director and General Counsel
Federal Bureau of Prisons
320 First Street, NW-Suite 654
Washington, DC 20001

Re: Christian Iglesias
Reg. No. 17248-018

Dear Kathy:

Being a transgender woman in a male prison cannot be fun at all. Enclosed for ease of reference are copies of my December 20 letter to you and my December 27 letter to Christina Iglesias at FCI Butner. Can't we get this poor woman to FCI Dublin before she is raped again, or worse? Please let us know.

Many thanks.

Very truly yours,



James B. Craven III

JBCIII/jkl

Cc: Ms. Christine Iglesias

Ms. Kate Selby

... we recognize that people who identify as such can become pregnant and seek abortions; we strive to meet the needs of all people who seek our funding.”

While not widely known for trans inclusivity, Planned Parenthood provides several health services for transgender people. For many trans people around the country, Planned Parenthood clinics are the only places where they can access hormones. This is true even in states where clinics are under attack, barred from providing abortion care to their clients. Many Planned Parenthood clinics have gender-neutral restrooms to make their offices comfortable for transgender and gender-nonconforming clients.

That is the premise behind the collection [...] *Octavia's Brood: Science Fiction Stories From Social Justice Movements*.

Many folks have asked us in the years we have been working on this collection what science fiction could possibly have to do with social justice organizing. And we respond, “Everything. Everything.”

We strongly believe that all organizing is science fiction - we wanted organizers and movement builders to be able to claim that space, to be the ones writing those visionary stories. Using their every day realities and experiences changing

Continued on Page 10...

Possible Transfer of Transgender People to Prisons Matching Their Identity

Are you a transgender person currently incarcerated in the Federal Bureau of Prisons? Are you interested in getting moved to the gendered prison that matches your identity (for example, if you're a transgender woman, do you want to be moved to a women's prison)? The BOP claims that they are moving some transgender people to prisons that match their gender identity, we have never heard of any examples of this. We are working with a team of people trying to advocate for specific individuals to be transferred. We cannot promise anyone will get moved, but we do want to collect information from people who might want to be moved. If you are one of these people, please send us the following information:

Name, number, address, sentence length (including likely release date), any history with disciplinary tickets, current classification level (if you know it), whether or not you have been diagnosed with gender dysphoria or gender identity disorder, what types of gender affirming recognition you already have from the BOP (such as hormone therapy, if they allow you to get gender appropriate underwear, medical care, etc.), and any other information you think would be important to know.

Please send this information to -
Black and Pink - Federal Housing
1 Columbia Rd.
Chester, MA 02125

Cristian Iglesias #17248-018
USP MARION
U.S. PENITENTIARY
P.O. BOX 1000
MARION, IL 62959

Hi Cristina,

I hope this letter finds you as well as possible. Some updates that I got from Alix McLearn, Female Offender Branch Administrator, are:

- In order to be eligible for transfer an inmate needs to show that they would be successful and orderly leading up to and after the transfer.
- The current facility you are at, including social workers, relevant nurses, officers, psychiatric care, and warden, need to believe that a transfer would be in your "best interest."

Alix would not clarify what it meant to satisfactorily show that someone is "successful and orderly" but it was insinuated that one would have to keep a low profile and stay clear of any disciplinary action.

As for communicating with the Transformative Justice Law Project, I haven't been able to get a hold of anyone since I talked to them in the summer. Tanvi Sheth has been our main contact, but he hasn't been returning the Network's call. I haven't been able to get in touch with the ACLU either, but it is something that I am still working on.

In the meantime, I have attached a list of organizations that may be able to support you in the specific asks that you made in your last letter. At our core, we are a domestic violence organization and are required to maintain strict standards of confidentiality.

Because of this, the organizations listed may be better equipped to publicize your situation. Some of the places listed are non-profits or organizing groups, others are news publications. Even if these organizations do not print their own publications, they may be able to forward your stories on in a way that the NW Network cannot.

I hope this is useful.

^ " "