

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CRISTINA NICHOLE IGLESIAS
(a.k.a. CRISTIAN NOEL IGLESIAS),

Plaintiff,

v.

IAN CONNORS, *et al.*,

Defendants.

Case No. 19-cv-00415-RJN

DEFENDANTS' STATUS REPORT

Defendants respectfully submit this Status Report pursuant to the Court's February 22, 2022 Order providing that "Defendants shall file weekly updates on contacts with the surgeon, the surgeon's response, and any other items relating to Ms. Iglesias's care on Friday, February 25, 2022, by 5:00 p.m., and every Friday thereafter by 5 p.m. until further notice." ECF No. 200 at 2.

As previously reported, BOP's contractor has scheduled an appointment with a surgeon for a consultation for gender-confirmation surgery on April 7, 2022. Through the attached Declaration of Jenna Eplin, BOP reports that on March 4, 2022, BOP was informed by its contractor that it had found and scheduled an earlier appointment for a consultation on March 23 with a second surgeon. Eplin Decl. ¶ 5. As Plaintiff's recent filing indicates, Defendants have advised Plaintiff's counsel of this earlier appointment with the second surgeon and provided the surgeon's name to Plaintiff's counsel. Doc. 219 at 3. Defendants will also provide this surgeon's name and other relevant information to the Court in a sealed supplement to this status report. BOP continues to consider both surgeons and, for the time being, plans to keep both the March 23 appointment and the April 7 appointment.

BOP further reports that its contractor has also now identified a dermatologist who has agreed to have a consultation with Ms. Iglesias regarding permanent hair removal at the surgical site. Epplin Decl. ¶ 9. BOP has scheduled an initial consultation for Ms. Iglesias with that dermatologist for March 24, 2022. *Id.*

BOP has also made substantial progress on securing the two letters of referral from mental health professional recommending Plaintiff for surgery. *Id.* ¶ 10. On March 10, 2022, one such letter was completed. *Id.* The second letter is in progress, and BOP expects that it will be completed in advance of Ms. Iglesias's scheduled consultations. *Id.*

Finally, BOP reports that Ms. Iglesias transferred to a Residential Reentry Center on March 10, 2022 as scheduled. *Id.* ¶ 11.

Dated: March 11, 2022

STEVEN D. WEINHOEFT
United States Attorney

LAURA J. JONES
Assistant United States Attorney

Respectfully submitted,

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CRISTINA NICHOLE IGLESIAS (a.k.a.,)	
CRISTIAN NOEL IGLESIAS),)	
)	
Plaintiff,)	
)	
vs.)	Case No. 19-cv-00415-NJR
)	
IAN CONNORS, ET AL.,)	
)	
Defendants.)	

DECLARATION OF JENNA EPPLIN

I, Jenna Epplin, make the following declaration, in accordance with the provisions of 28 U.S.C. § 1746:

1. I am currently employed by the Federal Bureau of Prisons (“BOP”) as National Policy and Program Coordinator (Transgender Inmates) for the BOP’s Women and Special Populations Branch of the Reentry Services Division. I have held my current position since August 2020. I have been employed by the BOP since June 2002. Additionally, I serve as a member of the BOP’s Transgender Executive Council and have done so since August 2020.

2. I am aware the Court ordered Defendants to “file weekly updates on contacts with the surgeon, the surgeon’s response, and any other items relating to Ms. Iglesias’s care on Friday, February 25, 2022, by 5:00 p.m., and every Friday thereafter by 5 p.m. until further notice.” (Doc. 200).

3. I have been informed of certain developments since the Court was last updated on March 4, 2022 (Doc. 212). I write now to update the Court about those developments.

4. I previously advised the Court that Surgeon 1 scheduled an appointment for consultation with Ms. Iglesias on April 7, 2022; and that Practice 2 and Practice 3 declined to see Ms. Iglesias. (Doc. 212-1).

5. In the late afternoon of March 4, 2022, BOP was notified that its contractor had located a fourth surgeon (Surgeon 4) who performs gender confirmation surgery in the Miami, FL area and scheduled an appointment for Ms. Iglesias to meet for consultation with Surgeon 4 for March 23, 2022.¹

6. BOP intends to proceed with the March 23, 2022, appointment with Surgeon 4.

7. BOP also is currently still keeping the appointment for consultation with Surgeon 1 on April 7, 2022.

8. Additionally, in furtherance of BOP's efforts to identify other options for hair removal at the surgical site, BOP's contractor identified a dermatologist in the Miami area who performs permanent surgical site hair removal for an initial consultation, and on March 8, 2022, BOP's contractor scheduled an appointment for Ms. Iglesias for March 24, 2022.

9. Furthermore, BOP has requested two letters of referral from qualified mental health providers. On March 10, 2022, one such letter was completed. It is expected the 2nd letter can be completed in advance of Ms. Iglesias's scheduled consultations.

10. Finally, Ms. Iglesias transferred to a Residential Reentry Center on March 10, 2022, as scheduled.

11. BOP remains committed to providing Ms. Iglesias appropriate care and continues working diligently with our contractor.

¹ Although this information was not included in my March 4, 2022, declaration (Doc. 212-1), as it was learned after my declaration had been finalized and signed, I have been advised Ms. Iglesias and her counsel were advised of the appointment on approximately March 7, 2022.

I declare under penalty of perjury that the foregoing is true and correct to the best of my belief. Executed on this 11th day of March 2022.

Jenna Epplin