

**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-NJR

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.

I. BOP's Efforts to Secure a Surgeon

As previously reported, BOP's contractor has scheduled an appointment with a surgeon (Surgeon 1) for a consultation for gender-confirmation surgery on April 7, 2022. The appointment with Surgeon 1 remains scheduled. Declaration of Jenna Epplin ¶ 4.

BOP is also working to identify alternative options in case Surgeon 1 declines Ms. Iglesias as a patient. BOP continues to evaluate whether it might be feasible to have Ms. Iglesias referred to the Chicago-based surgeon identified by Plaintiff's counsel. *Id.* ¶ 9. BOP has inquired with the Office of Probation and Pretrial Services at the Administrative Office for the United States Courts regarding housing Ms. Iglesias in Chicago. *Id.* Additionally, BOP has begun to evaluate whether using the Chicago-based surgeon identified by Plaintiff's counsel would present any procurement or contracting

issues. *Id.* BOP also is considering expanding its search for a surgeon beyond Miami, to include the surrounding area in Florida. *Id.* ¶ 10.

II. BOP's Efforts to Provide Permanent Hair Removal

As previously reported, BOP's contractor identified a dermatologist in the Miami area and scheduled an appointment for Ms. Iglesias for March 24, 2022. Doc. 220 at 2. That appointment took place on March 24, 2022. Epplin Decl. ¶ 6. BOP has requested the record from the dermatology appointment. *Id.*

III. BOP's Efforts to Provide Two Referral Letters

As previously reported, BOP has also made substantial progress on securing the two letters of referral from mental health professionals recommending Plaintiff for surgery. Doc. 227 at 3-4. One such letter was completed on March 10, 2022. *Id.* at 3. The second letter is being prepared by a BOP psychologist in the Miami area, who met with Ms. Iglesias on March 23, 2022, for purposes of preparing the letter. Epplin Decl. ¶ 7. It is expected the second letter will be completed by approximately the end of March. *Id.*

IV. Information About BOP Practices for Specialized Medical Care

Plaintiff has requested information about "how Defendants ordinarily handle situations where an individual in their custody needs specialized medical care that is not available nearby[.]" Doc. 228 at 2. On March 24, 2022, Defendants' counsel provided information in response to Plaintiff's request. Thereafter, Plaintiff's counsel asked an additional question, and BOP is looking into that question.

Dated: March 24, 2022

STEVEN D. WEINHOFET
United States Attorney

LAURA J. JONES

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 18, 2022 (Doc. 227). 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 (Doc. 212-1); and that Surgeon 4 scheduled an appointment for Ms. Iglesias to meet for consultation on March 23, 2022. (Doc. 220-1).

5. The BOP continues to intend to proceed with the consultation with Surgeon 1 on April 7, 2022. The March 23, 2022, appointment with Surgeon 4 was cancelled after BOP received confirmation from Ms. Iglesias that she did not want to attend the appointment.

6. Additionally, I previously explained that BOP's contractor identified a dermatologist in the Miami area and scheduled an appointment for Ms. Iglesias for March 24, 2022 (Doc. 220-1). That appointment took place on March 24, 2022. BOP has requested the record from the dermatologist appointment.

7. Furthermore, I previously explained that BOP has requested two letters of referral from qualified mental health providers, and that on March 10, 2022, one such letter was completed. (Doc. 220-1). The second letter is being prepared by a BOP psychologist in the Miami area, who met with Ms. Iglesias on March 23, 2022, for purposes of preparing the letter. It is expected the second letter will be completed by approximately the end of March.

8. I have been advised by BOP's contractor that since her transfer to the Residential Reentry Center (RRC), Ms. Iglesias has had continued access to hormone therapy. I have been advised that Ms. Iglesias has visits scheduled next week with her Primary Care provider and a Behavioral Health provider, who manages Ms. Iglesias's hormone therapy.

9. BOP continues to evaluate whether it might be feasible to have Ms. Iglesias referred to the Chicago-based surgeon identified by Plaintiff's counsel. I have been advised BOP has inquired with the Office of Probation and Pretrial Services at the Administrative Office for the United States Courts regarding housing Ms. Iglesias in Chicago. Additionally, I have been advised BOP has begun to evaluate whether using the Chicago-based surgeon identified by Plaintiff's counsel would present any procurement or contracting issues.

10. I have been advised BOP is considering expanding its search for a surgeon beyond Miami, to include the surrounding area in Florida.

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

I declare under penalty of perjury that the foregoing is true and correct to the best of my belief. Executed on this 25th day of March 2022.

Jenna Epplin