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Attorneys for Defendants

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 issued a Preliminary Injunction on April 26, 2022, which in part states “[t]he proposed permanent injunction and/or status report filed at the conclusion of the 21-day period shall report Defendants’ progress on paragraphs 1-5 above, and shall also address a schedule for future status reports.” (Doc. 252 ¶ 12).

3. I have been informed of certain developments related to the issues addressed in paragraphs 1-5 of the Preliminary Injunction (Doc. 252). I write now to update the Court about those developments.

4. On May 5, 2022, Ms. Iglesias had a tele-health consultation with the Chicago-based surgeon. I was advised following the appointment, the surgeon had a question about security protocols, and I was advised the BOP responded that Ms. Iglesias can attend appointments on her own without restraints or a security escort. I have been advised BOP recently received the medical record BOP requested from the consultation and I have been advised that BOP is working to schedule an in-person appointment with the Chicago-based surgeon.

5. Additionally, on April 26, 2022, Ms. Iglesias had a dermatology appointment for laser hair removal at the (vaginoplasty) surgical site.

6. Ms. Iglesias's next laser hair removal appointment is scheduled for June 2, 2022. At that appointment, Ms. Iglesias is scheduled to receive laser hair removal at the surgical site, as well as facial hair removal.

7. 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 18th day of May 2022.

Jenna Epplin