

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

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

Plaintiff,

v.

BUREAU OF PRISONS, *et al.*,

Defendants.

Case No. 19-cv-00415-NJR

JOINT STATUS REPORT

The parties respectfully submit this Joint Status Report pursuant to paragraph 9 of the Court's May 31, 2022, Stipulated Order, as modified on July 28, 2023, providing that the parties shall update the Court on significant developments related to the surgeries described in the Stipulated Order. Docs. 269, 320.

Vaginoplasty, Breast Augmentation, and Hormones

As previously reported, Ms. Iglesias underwent vaginoplasty and breast augmentation procedures with Surgeon 2 on March 30, 2023. Most recently, Ms. Iglesias had a follow-up visit with Surgeon 2's team on July 5, 2023, and had another post-operation visit with Surgeon 2 on July 12, 2023. 8/22/2023 Hurt Decl. ¶ 4.¹ During the July 5, 2023, appointment, Ms. Iglesias was cleared from restrictions from her vaginoplasty and breast augmentation procedures. *Id.* An additional follow-up appointment with Surgeon 2 (and/or Surgeon 2's team) is currently scheduled for mid-September 2023. *Id.* Ms. Iglesias has had continued access to hormone therapy via daily self-

¹ This Joint Status Report is accompanied by a declaration from the Assistant Health Services Administrator at the Metropolitan Correctional Center in Chicago, Illinois (MCC Chicago), because the prior declarant—Ms. Himlie, the Health Services Administrator at MCC Chicago—has recently been on extended leave. 8/22/2023 Hurt Decl. ¶ 3.

administration by pill. *Id.* ¶ 6.

Facial Feminization Surgery

As previously reported, Ms. Iglesias underwent facial feminization surgery with Surgeon 9 on June 15, 2023. Most recently, Ms. Iglesias had a follow-up appointment with Surgeon 9's team on July 5, 2023, and was advised that restrictions from facial surgery could be tentatively lifted as of July 27, 2023. 8/22/2023 Hurt Decl. ¶ 5. An additional follow-up appointment with Surgeon 9 (and/or Surgeon 9's team) is currently scheduled for mid-September 2023. *Id.*

Hair Removal

During the appointment with Surgeon 9's team on July 5, 2023, Surgeon 9's office indicated that facial laser hair removal could resume beginning July 27, 2023, assuming Ms. Iglesias is healing appropriately at that time. Because no complications have developed, Ms. Iglesias has an appointment for laser hair removal scheduled for late August 2023. 8/22/2023 Hurt Decl. ¶ 5.

Release Date

Ms. Iglesias's current release date is December 28, 2023.

Settlement Agreement Payment and Stipulation of Dismissal

In light of Ms. Iglesias's upcoming follow-up appointments scheduled for mid-September 2023, the parties are continuing to confer about the timing of the government's payment to cover future unexpected medical costs associated with the surgeries and Plaintiff's stipulation of dismissal with prejudice. *See* 5/2/2023 Jt. Status Report at 2–3, Doc. 315; Settlement Agreement ¶¶ 1(c), 2, Doc. 267-2. The parties anticipate providing a more substantive update on these issues in their next joint status report, due to be filed on October 17, 2023, to the extent the case remains pending on that date.

Dated: August 22, 2023

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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 CHARISSA HURT

I, Charissa Hurt, 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 Assistant Health Services Administrator at the Metropolitan Correctional Center in Chicago, Illinois (MCC Chicago). I have held my current position since June 2020. I have been employed by the BOP since August 2015.

2. I am aware the Court ordered the Parties, as amended, to “file a joint status report updating the Court on significant developments related to the surgeries described [in the Court’s May 31, 2022 Stipulated Order] on August 22, 2023, and every eight weeks thereafter, until the Parties believe that such joint status reports are no longer necessary, but in no case extending past Plaintiff’s release from BOP custody.” (Doc. 320).

3. I am aware Ms. Shari Himlie has previously provided declarations in support of prior status reports. Ms. Himlie has recently been on extended leave, so I write now to update the Court about those developments that have occurred since the status report submitted on June 27, 2023.

4. Ms. Iglesias had follow-up visit with Surgeon 2’s team on July 5, 2023, and had

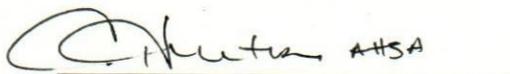
another post-operation visit with Surgeon 2 on July 12, 2023. During the July 5, 2023 appointment, Ms. Iglesias was cleared from restrictions from her vaginoplasty and breast augmentation procedures. An additional follow-up appointment with Surgeon 2 (and/or Surgeon 2's team) is currently scheduled for mid-September 2023.

5. Additionally, Ms. Iglesias had a follow-up appointment with Surgeon 9's team on July 5, 2023, and was advised that restrictions from facial surgery could be tentatively lifted on July 27, 2023, after which facial laser hair removal may resume assuming Ms. Iglesias is healing appropriately at that time. Because no complications have developed, Ms. Iglesias has an appointment for laser hair removal scheduled for late August 2023. An additional follow-up appointment with Surgeon 9 (and/or Surgeon 9's team) is also currently scheduled for mid-September 2023.

6. Ms. Iglesias has continued access to hormone therapy via daily self-administration by pill.

7. BOP remains committed to providing Ms. Iglesias appropriate care. BOP is continuing to work with providers and the contractor who is responsible for arranging outside medical appointments for individuals housed at MCC Chicago.

I declare under penalty of perjury that the foregoing is true and correct to the best of my belief. Executed on this 22nd day of August 2023.

 A handwritten signature in black ink, appearing to read "Charissa Hurt" with the initials "AHSA" written to the right of the signature.

Charissa Hurt