

**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 September 15, 2023. 10/17/2023 Long Decl. ¶ 4.¹ Surgeon 2 noted that Ms. Iglesias was doing well and advised that she be seen for another follow-up in 8-10 weeks. *Id.*

Facial Feminization Surgery

As previously reported, Ms. Iglesias underwent facial feminization surgery with Surgeon 9 on June 15, 2023.

¹ This Joint Status Report is accompanied by a declaration from a Health System Specialist in BOP's Reentry Services Division because, as noted below, Ms. Iglesias was recently transferred to a Residential Reentry Center. 10/17/2023 Long Decl. ¶ 3.

Transfer to Residential Reentry Center / Release Date

On October 2, 2023, Ms. Iglesias was transferred from MCC Chicago to a Residential Reentry Center (RRC) in the Chicago Area. 10/17/2023 Long Decl. ¶ 5. Ms. Iglesias's current release date is December 28, 2023.

Hair Removal

As previously reported, Ms. Iglesias stopped facial hair removal in advance of facial feminization surgery, per the instructions of Surgeon 9's office. BOP scheduled an appointment for facial hair removal to resume in late August 2023, but the provider had to cancel the appointment. 10/17/2023 Long Decl. ¶ 6. BOP then scheduled a facial hair removal appointment with a different provider for late September 2023, but that provider also had to cancel due to a transfer of medical directors and staff changeouts. *Id.* The appointment with the new provider was rescheduled for early October, but was canceled after Ms. Iglesias arrived for the appointment. The appointment was again rescheduled for the following week, but was also canceled after Ms. Iglesias arrived for the appointment. The appointment is currently scheduled for late October 2023. *Id.* BOP and its healthcare contractors will continue to schedule and pay for Ms. Iglesias' facial hair removal until her release from BOP custody, currently scheduled for December 28, 2023.

Settlement Agreement Payment and Stipulation of Dismissal

The government expects to initiate the process for making the payment to cover future unexpected medical costs within the next several weeks. *See* 5/2/2023 Jt. Status Report at 2–3, Doc. 315; Settlement Agreement ¶¶ 1(c), 2, Doc. 267-2. Consistent with the parties' settlement agreement, Plaintiff will file a stipulation of dismissal with prejudice within fourteen days of Defendants making the payment. Until Ms. Iglesias is released from federal custody, including from the RRC, BOP will continue to provide her with medical care and pay for those costs, including those described in paragraph 7 of the Court's stipulated order (Doc. 269).

Dated: October 17, 2023

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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 STEPHANIE LONG

I, Stephanie Long, 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 Health System Specialist in the BOP’s Reentry Services Division. I have held my current position since March 2023. I have been employed by the BOP since January 2012.

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 BOP Staff from the Metropolitan Correctional Center in Chicago, Illinois (MCC Chicago), have previously provided declarations in support of prior status reports. Ms. Iglesias recently transferred from MCC Chicago to a Residential Reentry Center (RRC), so I write now to update the Court about those developments that have occurred since the status report submitted on August 22, 2023.

4. Prior to leaving MCC Chicago, Ms. Iglesias had a follow up appointment with Surgeon 2 on September 15, 2023. Surgeon 2 noted she is doing well, and advised to follow up in 8-10 weeks.

5. On October 2, 2023, Ms. Iglesias transferred from MCC Chicago to a RRC in the Chicago area. Accordingly, the BOP's Reentry Services Division is now involved in logistics for providing Ms. Iglesias medical care.

6. As previously reported, Ms. Iglesias stopped facial hair removal in advance of facial feminization surgery, per the instructions of Surgeon 9's office. BOP scheduled an appointment for facial hair removal to resume in late August 2023, but the provider had to cancel the appointment. BOP scheduled a facial hair removal appointment with a different provider for late September 2023, but that provider also had to cancel due to a transfer of medical directors and staff changeouts. Ms. Iglesias has an appointment for facial hair removal scheduled for late October 2023.

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 Ms. Iglesias.

I declare under penalty of perjury that the foregoing is true and correct to the best of my belief. Executed on this 17th day of October 2023.

Stephanie Long