



Still In Danger:

The Ongoing Threat of
Sexual Violence against
Transgender Prisoners

Stop Prisoner Rape
ACLU National Prison Project

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2005

About Stop Prisoner Rape and the ACLU National Prison Project



Stop Prisoner Rape (SPR) is a national human rights organization that seeks to end sexual violence against men, women, and youth in all forms of detention. SPR offers hope in three ways: by pushing for policies that ensure institutional accountability, by changing society's attitudes toward prisoner rape, and by promoting access to resources for survivors of sexual assault behind bars. SPR was one of the driving forces behind the passage of the 2003 Prison Rape Elimination Act (PREA), the first-ever federal legislation that addresses sexual violence behind bars. As the only organization in the country that works solely on this issue, SPR is closely monitoring PREA's implementation.



The National Prison Project of the American Civil Liberties Union (ACLU) is the only national litigation program on behalf of men, women, and juveniles confined in prisons and jails. Since 1972, the National Prison Project has successfully represented over 100,000 people in order to create constitutional conditions of confinement and strengthen prisoners' rights. The National Prison Project also advocates for criminal justice policy reform and educates the public about the social and fiscal ramifications of incarceration and the government's deliberate move away from rehabilitation toward debilitating imprisonment.

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Executive Summary

Eleven years have passed since the Supreme Court's 1994 ruling in *Farmer v. Brennan*, the precedent-setting case brought by transgender plaintiff Dee Farmer, in which the Court held that prisoner rape is constitutionally unacceptable. In the time since that ruling, transgender inmates in some facilities have seen modest progress toward humane treatment, but sexual violence in detention is still an alarming reality for transgender individuals throughout the country.

The court's ruling in *Farmer* has proved troubling over the last decade. Some interpretations of *Farmer* shielded corrections officials from liability in all but the most extreme cases of "deliberate indifference" to threats of sexual violence. Furthermore, classification for transgender inmates continues to be problematic. They are often placed in either automatic protective custody with few opportunities to participate in programs, or with the general population without regard to their unique needs and physical appearance. More encouraging developments since the ruling have been the California Department of Corrections' creation of a clinic for transgender prisoners at its Vacaville facility, and the 2002 development of a protocol by the National Lawyers Guild and the City and County of San Francisco Human Rights Commission

for housing transgender inmates safely and humanely in a correctional setting.

Stop Prisoner Rape (SPR) and the National Prison Project of the American Civil Liberties Union (ACLU) believe that despite a few positive changes, the situation faced by transgender inmates remains grim. The passage of two federal laws, the Prison Litigation Reform Act (PLRA) in 1996 and the Prison Rape Elimination Act (PREA) in 2003 have and will continue to have an impact on the problem of sexual violence behind bars. On the one hand, the PLRA greatly limits inmates' ability to bring civil claims, including claims of sexual abuse, in federal courts. On the other, PREA is a positive step forward that ensures heightened federal scrutiny of the problem of prisoner rape.

This report provides an overview of the legal implications of *Farmer v. Brennan* for prisoner claims of Eighth Amendment violations and an assessment of changes to conditions for transgender prisoners in the 11 years since *Farmer*. A selection of first-person accounts by transgender prisoners offers insight into the realities of sexual violence behind bars since the Supreme Court's ruling. The report concludes with a set of recommendations to detention facilities for protecting transgender inmates.



Introduction

At the time of the Supreme Court's ruling in *Farmer v. Brennan* in June 1994, plaintiff Dee Farmer was a pre-operative male-to-female transsexual serving a 20-year sentence for credit card fraud in a men's maximum security federal prison in Terre Haute, Indiana. Prior to incarceration in 1986 she underwent breast augmentation and an unsuccessful black market surgery to remove her testicles. In prison, Farmer maintained a feminine appearance that was enhanced by hormone treatments and feminine clothing. In 1989, she was transferred to the general population of the U.S. Penitentiary in Terre Haute. Less than two weeks after her arrival, another prisoner entered her cell and demanded sex. Upon refusing, Farmer was punched in the face, pushed, and kicked. Her attacker tore off her clothes and forced her down on to a bed, raping her at knife-point and threatening to kill her if she reported the attack.

Acting without a lawyer, Farmer filed a complaint in the U.S. District Court against the Federal Bureau of Prisons' director, regional director, and several wardens and administrators who authorized her transfer to the prison in Terre Haute. She alleged that the defendants violated her Eighth Amendment right to be free from cruel and unusual punishment. The District Court dismissed Farmer's claim, and the Seventh Circuit Court of Appeals affirmed that decision. Still acting as her own attorney, Farmer appealed to the U.S. Supreme Court. In June 1994, after the American Civil Liberties Union was appointed to represent her, the Supreme Court ruled unan-

imously that officials have a responsibility to safeguard prisoners from violence perpetrated by other prisoners, vacated the lower court decisions, and remanded Farmer's lawsuit. Justice David Souter wrote in the majority opinion that, "being violently assaulted in prison is simply not 'part of the penalty that criminal offenders pay for their offenses against society.'"¹ While the decision clearly condemns incidents of prisoner rape, it also limits the extent of prison officials' liability for what occurs in the facilities they oversee — a legal standard known as "deliberate indifference."

Eleven years after *Farmer*, the court's opinion is often cited in civil cases dealing with dangerous prison conditions. But the criteria that *Farmer* establishes for demonstrating that prison officials have exhibited "deliberate indifference" toward dangerous conditions for prisoners have allowed jails, prisons, and immigration detention centers to remain very risky places for transgender prisoners. The dangerous housing situation that Dee Farmer encountered is no longer universal, but many transgender prisoners still face sexual violence or pressure, are forced to live in virtual isolation, and have very limited access to appropriate medical care. Some have concluded that *Farmer* creates a "perverse incentive"² for corrections officials to remain ignorant of danger behind bars. Due in part to this incentive, many forms of institutional confusion and callousness toward the situation of transgender prisoners continues to be a reality.

Case Study: Roman Eppert

Roman Eppert was raped in her cell in 1999 by two assailants at the Richard J. Donovan Correctional Facility in San Diego. The assault occurred after her requests to be moved to a safer housing situation were denied. In a letter to SPR, Eppert wrote, "I attempted to get a bed move out of the assigned cell that I was in... [W]hen I asked for the bed move the Correctional Officer...that ran the building & was in charge of the bed moves refused to grant me the bed move because the Officer told me that my celly did not want me to move... I explained to the Officer that me & my celly were not getting along & the Officer stated to me that he did not care... Three days later I was raped."

Eppert reported her assault to a prison mental health specialist, after being reassured of the confidentiality of their discussions. However, the doctor broke his word, and Eppert was placed in isolation against her will. She was eventually returned to the general population at the facility, after refusing to cooperate with the investigation due to the unwanted attention it brought her. Eppert said that she never filed a complaint against the two men who attacked her, because of the "shame and disgrace" that the incident inflicted upon her. She wrote, "I still...blame myself. It's just hard to explain."



Farmer v. Brennan as Legal Precedent

Deliberate Indifference

Prior to *Farmer*, in the 1976 case *Estelle v. Gamble*, the Supreme Court found that prisoner claims of Eighth Amendment violations for neglecting prisoners' medical needs could only be supported if corrections officials were found to have shown "deliberate indifference" to the prisoners' serious health needs.³ However, the *Estelle* ruling did not clearly define this standard, which was interpreted differently by different courts. It was left to *Farmer* to clarify "deliberate indifference," as it applies to the issue of prisoner safety.

In *Farmer*, the Court held that "deliberate indifference" requires that an official "knows of and disregards an excessive risk to prisoner health or safety; the official must both be aware of facts from which the inference could be drawn that a substantial risk of serious harm exists, and he must also draw the inference."⁴ This so-called "knowledge requirement" has come to be a critical factor in determining officials' liability under the Eighth Amendment;⁵ such liability can only be established if "the prisoner proves the official *knew* the prisoner was at risk of being assaulted."⁶ It is not sufficient under *Farmer* to demonstrate that an official *should have known* about a risky situation because the risk was objectively obvious. *Farmer* demands, instead, that a prisoner accomplish the difficult task of proving the subjective knowledge that particular staff members had prior to the incident.⁷

While the Court's ruling brought clarity to the issue of Eighth Amendment claims, it set a very high standard for liability. The difficulties for prisoners have been exacerbated by lower court decisions. These decisions sometimes ignore the Supreme Court's cautions, for example, that a prisoner can establish a prison official's knowledge through circumstantial evidence in various ways, and that an official cannot escape liability by refusing to verify facts that the official strongly suspects to be true.⁸ "The legal rules that the courts have developed relating to prisoner-on-prisoner sexual abuse create perverse incentives for authorities to ignore the problem," Human Rights Watch wrote in its report *No Escape: Male Rape in U.S. Prisons*. "The incentive this legal rule creates for correctional officials to remain unaware of problems is regrettable. Indeed, in many lawsuits involving prisoner-on-prisoner rape, the main thrust of prison officials' defense is that they were unaware that the victim was in danger."⁹

The Prison Litigation Reform Act

The significance of *Farmer v. Brennan* as a legal precedent must also be understood in the context of the Prison Litigation Reform Act (PLRA), a 1996 law that limits the ability of prisoners to seek redress in federal court for civil claims. The PLRA requires prisoners to exhaust all administrative remedies before filing a claim, and to demonstrate that they have experienced physical harm prior to filing a claim for damages. It also undercuts court supervision of prison and jail systems, and limits attorney fees for lawyers representing prisoners.

The consequences of the PLRA, as it relates to sexual violence, are serious because the Act may in some cases require a prisoner to seek administrative redress from the very corrections officers who victimized him or her. Moreover, prisoners typically have limited literacy skills. Unless a prisoner can successfully navigate through several layers of written grievances and appeals, usually with short deadlines, the prisoner can be permanently barred from seeking justice in the courts. A separate provision of the PLRA bars prisoners from seeking damages for sexual harassment, invasions of privacy such as strip searches, and inappropriate sexual touching that falls short of sexual assault.

The Prison Rape Elimination Act

A second law, the Prison Rape Elimination Act of 2003 (PREA), is also relevant to the discussion of "deliberate indifference." The heightened exposure this law brings to the issue of sexual violence in detention will make it less likely that corrections officials are unaware of the risks to inmates. Among the most important provisions of PREA are: establishing a zero-tolerance standard for sexual assaults of any kind within corrections systems; mandating collection of national data on the incidence of prisoner rape; providing funding for research and program development; creating a federal commission to hold hearings and develop standards for states on how to address this problem; and creating a review panel to determine the best and worst performing detention facilities in the country.

While the PREA does not in itself create any new course of action for inmates seeking legal redress, it may eventually increase the level of federal scrutiny of

the problem of rape behind bars. In the National Institute of Corrections' preliminary discussion of the implementation of PREA, for example, the risk of sexual assault faced by gay and transgender inmates has been prominently highlighted.¹⁰ Still, since the Act's passage, the prevalence of prisoner rape has not declined.

Excessive Reliance on Isolation

Transgender prisoners, by definition, do not fit into simple male-female gender categories, and many correctional facilities do not address their unique needs. In the recent book *Prison Masculinities*, the authors note the risks faced by transgender inmates, explaining that, "[s]exuality is a key locus through which domination and subordination are constructed in prison. Weak men are dominated and raped. Sexual 'deviants,' such as openly gay men, bisexuals, transvestites and transgendered people, are ridiculed and reduced to lower status positions."¹¹

Aware of the risk of assault, but reluctant to create housing that accommodates transgender individuals, many facilities simply force these prisoners to live in some type of segregation. In some cases, this isolation is difficult to endure and may constitute a *de facto* punishment for a gender identity that does not conform to societal norms. In fact, according to Chris Daley, director of the Transgender Law Center in San Francisco, "Thus far, the most common step taken to 'protect' transgender prisoners has been to classify them for administrative segregation — allowing them no ability to participate in programs or job opportunities and limiting

Case Study: Seantain Cook

Almost immediately after arriving at the Arizona State Prison Complex - Lewis Morey in 2000, Seantain Cook began to have problems with other inmates. In correspondence to the ACLU she explained her situation, "As a homosexual/transsexual prisoner standing at five foot, four inches tall and weighing under 130 pounds, I find myself at the mercy of other prisoners. Within three months of my arrival to prison, I found myself sexually enslaved by a single domineering prisoner and forced to perform sexual favors in exchange for my 'protection' due to the deprivation of reasonable safety.

"After requesting Protective Custody asserting claims of prison rape and sexual slavery, I was blatantly denied Protective Custody on repeated occasions and forced from one prison to the other where I was continuously raped, extorted, and sexually assaulted at the hands of other prisoners."



Case Study: Latavia Diamond

Latavia Diamond was raped in 1997 at a reception center in a men's prison in Delano, California. In letters to SPR, she explained that, "As a prisoner, life is an on-going struggle. But as a transsexual prisoner the struggles are unlimited.

"I've done a majority of my life under and within the system, and know I am not the only one. But to live that life as a rape victim and prisoner is, at times, unbearable. I endure both, but the struggle is painful and most times scary...I can't erase nor change being and becoming a victim of Rape, but I can, now, fight to [make sure]... that others do not become victims as well. The fight is big and seriously ignored. Most victims are afraid to come forward, which is understandable, but not tolerable. 'We' can't defeat what 'we' wont face."



them to an hour a day, at most, out of their cell."¹²

A transgender woman serving time in Texas told the *GIC TIP Journal*, a publication for transgender prisoners published by the Gender Identity Center of Colorado, that, "About 90% of the girls in here — at least the ones with any significant breast development — are in segregation. I expect that, before too long, I will be there too." The prisoner added that none of her family members were willing to write to her, "So it seems that I will have to rely on my sisters in here, if I am going to have any hope at all of getting through this, which I don't."¹³

Risk of Assault in the General Population

SPR and the ACLU believe that blanket isolation should not be considered a solution for protecting transgender inmates. Nevertheless, a significant threat to the safety of this group comes from housing assignments that fail to make any accommodations at all for their gender identity.¹⁴ Transgender women behind bars continue to report that they are housed in the general population in male facilities, just as Dee Farmer was, and they continue to report that they are sexually assaulted in detention. One Arizona prisoner complained to the ACLU that the state has inadequate protective housing available, "which realistically throws helpless sheep [homosexuals/transsexuals] in with the wolves."¹⁵

Some corrections officials maintain an attitude of indifference to this threat of violence, or treat it as an inevitable part

of prison life for the transgender prisoner. Writing in the *GIC TIP Journal*, a California transgender prisoner reported that prison officials at San Quentin told her that, "I almost certainly would be the victim of sexual violence...[and warned] me that they could not do anything about it. If they were trying to scare me, it worked. I was frightened out of my wits by then, and I began to cry."¹⁶

According to Gianna Israel, a therapist and transgender advocate, transgender care outside of California is "spotty" and has not particularly improved since the *Farmer* decision. For the most part, Israel reports, transgender prisoners need to "hook up" in protective relationships as a matter of survival. Those individuals without the wherewithal to find protective relationships are the ones most likely to face sexual violence. "They end up getting gang raped. Sometimes they get set up by staff."¹⁷

Some Positive Signs

Though dangerous conditions remain the norm, a few corrections-oriented programs and publications have begun to deal with transgender safety in a more concerted and conscientious way. In 2003, the *CorrectCare* newsletter of the National Commission on Correctional Health Care published an article, "Transsexualism: A Correctional, Medical or Behavioral Health Issue?" in which the author, Rodney Fry, discussed the challenges involved in appropriately responding to transgender prisoners.

Fry called the housing of transgender prisoners, "a tough question...[that] depends on the transitional phase of the transsexual person." Suggesting that transgender women with "no appearance

of functional male genitalia" may be appropriately housed in a women's facility, Fry stated that, "transsexuals should be housed in general population whenever that's feasible based on physical appearance and the ability to maintain their safety."¹⁸ Indeed, SPR and the ACLU believe that one of the most important tools available to correctional personnel for preventing sexual assault of inmates is appropriate classification and housing. Due to the unique needs of transgender inmates, safe housing is crucial.

In a positive development, in 1999, Dr. Lori Kohler helped to establish a clinic for transgender prisoners at the California Medical Facility in Vacaville. At this facility, where Dr. Kohler has treated more than 300 inmates,¹⁹ a psychiatrist and a social worker sensitive to transgender issues provide what Kohler calls "a loose support group" and a "surprisingly decent" environment in terms of staff attitudes and prisoner safety. According to Kohler, transgender prisoners at Vacaville do not report sexual assault. Kohler says she is not aware of any other comparable programs in the nation. However, according to Kohler, transgender prisoners at Vacaville do not report sexual assault when it does occur. The efforts of the medical program at Vacaville do not appear to influence the approach to prisoner safety of other corrections staff. Transgender prisoners are often housed in dormitory settings, an environment known to expose them to a high risk for sexual assault.²⁰

In another positive step, in August 2002, the National Lawyers Guild and the City and County of San Francisco Human Rights Commission published a comprehensive analysis of how to ensure transgender prisoner safety. The 24-page guide, "Model Protocols on the

Treatment of Transgender Persons by San Francisco County Jail," addresses a broad range of concerns related to transgender prisoners, including policies on harassment, housing, hormone therapy, and strip searching.²¹ Some of the suggestions outlined in the protocol have already been implemented at the San Francisco Jail, while others are under review.²²

Conclusions and Recommendations

Transgender prisoners have seen modest progress toward humane treatment in some facilities since the *Farmer v. Brennan* ruling. Yet, for far too many individuals behind bars, sexual violence remains a constant threat. Housing decisions as indiscriminate and reckless as the one Dee Farmer faced continue to be made in parts of the country. Some corrections officials today have a degree of sensitivity toward the unique needs of this population, but accounts of abuse and indifference continue to surface. In short, the progress since *Farmer* has been partial and inconsistent, with many transgender prisoners continuing to face conditions that are no safer today than they were more than a decade ago.

SPR and the ACLU believe that several concrete, simple improvements can help institutions to create a safer environment for transgender inmates. These include:

- Acknowledging, as a matter of written policy and daily practice, the unique safety concerns of transgender people;
- Providing thoughtful housing alternatives, including non-punitive

Case Study:

Luisa Espinoza



Luisa Espinoza sought asylum in the United States in an effort to escape the persecution she faced as a transgender woman in her native Nicaragua. "They kill transgenders in my country," she explained in a 2003 press interview.²³ Hoping to find refuge from violence in the U.S., Espinoza instead encountered still more persecution while housed on the men's side of the Sacramento County Jail. Espinoza entered custody of the state of California as a pre-operative transgender woman. Before her incarceration, she began hormone treatments that caused her to grow breasts and lose facial hair.²⁴ At the time of her incarceration, Espinoza maintained male genitalia, so she was detained with men despite her feminine appearance.

Espinoza and fellow transgender detainees were singled out and habitually harassed. Once every week, corrections staff forced them to walk bare-chested past fellow prisoners and staff who gawked at them and insulted them. Jackie Tates, another transgender prisoner described the effect of the abuse, "I started having suicidal thoughts. I started to hate the fact that I was transgender."²⁵

With pressure from their lawyers, Espinoza and others were given sports bras by the medical staff at the facility and were able to stop the degrading ritual from occurring with regularity. Dani Williams, one of Espinoza's attorneys, contended that transgender prisoners who identify as women should be housed in a women's prison, "When I look at them, I see women. To boil it down to whether one has a penis is completely ridiculous."²⁶

Case Study:
Sophia²⁷



In some instances, segregation from the general population can improve the safety of transgender prisoners. However, this is not always the case. Sophia, a transgender prisoner in Florida, wrote to SPR, "In my first year of prison, I've been threatened, sexually harassed, and humiliated by FDOC [Florida Department of Corrections] Staff. I've been transferred 6 times, placed into confinement 5 times, denied medical treatment, and denied work opportunities all due to my appearance, and then there was the placement in a locked-down P.M. [protective management] Unit with...a predator who raped me."

Sophia was placed in the protective management area of Florida's Union Correctional Institution, ostensibly in an attempt by the state to prevent her from becoming a victim of assault. Yet, it was while in segregation that she was raped by "a 'predator' who had a prior 'relationship' with a transsexual" before her arrival. Sophia wrote, "When he started I yelled Stop, but nobody heard me. When he was done, he left. I closed and locked my door and cried all night. I was ashamed of feeling so helpless...I don't need to be an attorney to figure out that FDOC's failure to place me in a safe atmosphere is the cause of my Rape... I believe that for the State to send me to prison for a first-time, non-violent offense is only placing my life in danger. I am not a danger to the public, so why is the State KNOWINGLY placing me in danger?"

forms of segregation to transgender inmates. To the greatest extent possible, these inmates should be given an opportunity to choose housing that feels safe and gender-appropriate;

- Avoiding blanket housing policies, such as automatically placing all transgender people in segregation or automatically housing inmates in general population by genitalia;
- Allowing transgender inmates to choose the gender of corrections staff who perform strip searches;
- Respecting inmate objections to being paired with a specific cellmate due to fear of assault;
- Providing training for current and future corrections staff members on responding to instances of sexual abuse, and on strategies for identifying and protecting potential victims of sexual assault;
- Making clear to all employees that the following behaviors are absolutely unacceptable: suggesting that detainees should fight to avoid abuse, suggesting that sexual abuse is not significant enough to be addressed, and using rape as a tool to punish inmates for bad behavior;
- Establishing multiple avenues for filing a complaint so that detainees are not required to report grievances to an abusive staff member;
- Allowing relevant, independent monitoring and regulatory organizations to enter institutions and have broad access to detainees;

- Ending the sexual harassment and degradation of transgender individuals.

The *Farmer v. Brennan* legal standard has failed to hold prison officials sufficiently accountable. The "deliberate indifference" standard created by the ruling places a difficult burden on prisoner plaintiffs, who must prove that individual corrections officers had direct knowledge of a crime that is routinely denied, covered up, and ignored. The challenges of overcoming this burden and of protecting prisoner safety are particularly urgent in the case of transgender prisoners. The corrections community must improve its treatment of the transgender inmate population if it is to ensure the fundamental human rights of all incarcerated people. ■

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Endnotes

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- ² HUMAN RIGHTS WATCH, NO ESCAPE: MALE RAPE IN U.S. PRISONS 144 (2001).
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- ⁴ Id. 273, 288.
- ⁵ James J. Park, *Redefining Eighth Amendment Punishments: A New Standard for Determining the Liability of Prison Officials for Failing to Protect Prisoners from Serious Harm*, 20 QLR, 407, 412.
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- ⁷ Heather M. Kinney, *The Deliberate Indifference Test Defined: Mere Lip Service to the Protection of Prisoners' Civil Rights*, 5 TEMP. POL. & CIV. RTS. L. REV. 121, 128-29.
- ⁸ *Farmer*, 511 U.S. at 842, 843, n.8.
- ⁹ HUMAN RIGHTS WATCH, NO ESCAPE: MALE RAPE IN U.S. PRISONS 146 (2001).
- ¹⁰ NATIONAL INSTITUTE OF CORRECTIONS, HOW THE PREA AFFECTS YOU (July 21, 2004) at <http://nicic.org/Library/019821>.
- ¹¹ DON SABO, TERRY KUPERS, AND WILLIE LONDON, EDs., PRISON MASCULINITIES 109 (2001).
- ¹² Interview with Chris Daley, Director, Transgender Law Center, San Francisco (May 20, 2004)
- ¹³ Letter from Myqy, IV GENDER IDENTITY CENTER TRANSGENDEREDS IN PRISON JOURNAL 1, 7 (Winter 2003).
- ¹⁴ A critical safety issue for transgender prisoners, and one that continues to be problematic in most parts of the country, is the delivery of appropriate hormone therapy. Failure to provide hormones to individuals who have been accustomed to taking them, for example, has been shown to contribute to the risk of self-inflicted harm. An extended discussion of this issue is beyond the scope of this report, which is concerned exclusively with the risk of sexual assault to transgender prisoners.
- ¹⁵ Seantain Cook, *Sexual Slavery*, an essay sent to the ACLU.
- ¹⁶ Janet Loftin, *A Transsexual's Experience in the California Department of Corrections (CDC)*, IV GENDER IDENTITY CENTER TRANSGENDEREDS IN PRISON JOURNAL 2, 6 (Spring 2004).
- ¹⁷ SPR Interview with Gianna Israel, therapist and transgender advocate, (May 20, 2004)
- ¹⁸ Rodney L. Fry, *Transsexualism: A Correctional, Medical or Behavioral Health Issue?* CORRECTCARE (Winter 2003), at <http://www.ncchc.org/pubs/CC/transsexualism.html>.
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- ²⁰ Telephone Interview with Lori Kohler, (May 24, 2004).
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- ²² Telephone Interview with Marcus Arana, San Francisco Human Rights Commission Investigator (May 11, 2004).
- ²³ Cosmo Garvin, *What's She Doing in the Men's Jail?* SACRAMENTO NEWS & REVIEW, February 13, 2003
- ²⁴ Id.
- ²⁵ Id.
- ²⁶ Id.
- ²⁷ "Sophia" is a pseudonym to protect the identity of the actual prisoner.

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