

Original
True**FILED**
UNITED STATES DISTRICT COURT
DENVER, COLORADO

OCT 03 2024

JEFFREY P. COLWELL
CLERK**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No.

1:24-cv-01842-STV

(To be supplied by the court)

Joaquín Guzman Loera, Plaintiff

v.

Jury Trial requested:
(please check one)☐ Yes ☒ NoWarden Cielli USP Florence ADMAX.Counselor Holbrooks, counselor at USP Florence ADMAXCollette Peters-Director of BOPMerrick Garland-Attorney General of the U.S., Defendant(s).

(List each named defendant on a separate line. If you cannot fit the names of all defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section B. Do not include addresses here.)

PRISONER COMPLAINT**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievances, witness statements, or any other materials to the Clerk's Office with this complaint.

A. PLAINTIFF INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

Joaquín Guzman Loera 89914-053 PO BOX 8500 Florence, CO 81226
(Name, prisoner identification number, and complete mailing address)

(Other names by which you have been known)

Indicate whether you are a prisoner or other confined person as follows: (check one)

____ Pretrial detainee

____ Civilly committed detainee

____ Immigration detainee

____ ~~Convicted and sentenced state prisoner~~

☒ Convicted and sentenced federal prisoner

____ Other: (Please explain) _____

B. DEFENDANT(S) INFORMATION

Please list the following information for each defendant listed in the caption of the complaint. If more space is needed, use extra paper to provide the information requested. The additional pages regarding defendants should be labeled "B. DEFENDANT(S) INFORMATION."

Defendant 1: Warden Grolli; Warden at USP Florence ADMAX
(Name, job title, and complete mailing address)

PO BOX 8500 Florence, CO 81226

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ___ No (check one). Briefly explain:

At the time of the claims, he was the Warden at
USP Florence ADMAX, where I am incarcerated.

Defendant 1 is being sued in his/her ___ individual and/or ☒ official capacity.

Defendant 2: Counselor Holbrook; counselor at USP Florence ADMAX
(Name, job title, and complete mailing address)

PO BOX 8500 Florence, CO 81226

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one). Briefly explain:

At the time of the claims, he was and continues
being my counselor at Florence ADMAX

Defendant 2 is being sued in his/her ☐ individual and/or ☒ official capacity.

Defendant 3: Colette Peters; Director of the Bureau of Prisons
(Name, job title, and complete mailing address)

320 First St NW Washington, DC 20534

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one). Briefly explain:

Defendant 3 is being sued in his/her ☐ individual and/or ☒ official capacity.

C. JURISDICTION

Indicate the federal legal basis for your claim(s): (check all that apply)

☐ State/Local Official (42 U.S.C. § 1983)

☒ Federal Official

As to the federal official, are you seeking:

☒ Money damages pursuant to *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971)

☒ Declaratory/Injunctive relief pursuant to 28 U.S.C. § 1331, 28 U.S.C. § 1361, or 28 U.S.C. § 2201

☒ Other: (please identify) Any other remedy available that this court deems just.

D. STATEMENT OF CLAIM(S)

State clearly and concisely every claim that you are asserting in this action. For each claim, specify the right that allegedly has been violated and state all facts that support your claim, including the date(s) on which the incident(s) occurred, the name(s) of the specific person(s) involved in each claim, and the specific facts that show how each person was involved in each claim. You do not need to cite specific legal cases to support your claim(s). If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "D. STATEMENT OF CLAIMS."

CLAIM ONE: Special Administrative Measures (SAMs) imposed on me violate my constitutional rights

Claim one is asserted against these Defendant(s):

Warden Gollig; Counselor Holbrooks; Merrick Garland; Colette Peters

Supporting facts:

I am a Mexican national, who was extradited from Mexico to the U.S on January 2017, to face multiple criminal charges. Following a 3 month trial in the EDNY, I was found guilty and on July 17, 2019, I was ~~was~~ sentenced to life in prison. I was then transferred to USP Florence ADMAx, where I am currently incarcerated.

Since my extradition, I have been and continue to be under the SAMs (Special Administrative Measures). Since I was extradited more than seven years ago, the American government has kept me in solitary confinement without being able to speak to anyone and under SAMs. I am not permitted to have any verbal contact or communication with other inmates.

The then Attorney General of the U.S. (back in 2017) requested the imposition of the SAMs on me and said that it was necessary to restrict my access to the media, mail, telephone, visitors (essentially to restrict my access to the world). The government claimed that there was a risk that my contact with other people could result in death or injury to others, or that I could continue conspiring to commit additional criminal activity.

The SAMs restrict my access to mail, telephone, media, visitors, and limit my recreation and exercise time. The SAMs violate my right to associate with the community. The ~~defendants~~ defendants, by imposing the SAMs on me, are violating my right to family integrity by severely restricting my ability to maintain relationships with my family, and the right to family integrity is a right that is recognized in the U.S Constitution and protected by International human rights law.

(look at the additional papers attached)

E. PREVIOUS LAWSUITS

Have you ever filed a lawsuit, other than this lawsuit, in any federal or state court while you were incarcerated? ☒ Yes ☐ No (check one).

If your answer is "Yes," complete this section of the form. If you have filed more than one previous lawsuit, use additional paper to provide the requested information for each previous lawsuit. Please indicate that additional paper is attached and label the additional pages regarding previous lawsuits as "E. PREVIOUS LAWSUITS."

Name(s) of defendant(s):

Warden B. True; Holbrook; Merrick Garland; Michael Carrasquel

Docket number and court:

Case No. 21-2794

Claims raised:

same as this new action

Disposition: (is the case still pending?
has it been dismissed?; was relief granted?)

Dismissed without prejudice

Reasons for dismissal, if dismissed:

not sure

Result on appeal, if appealed:

Not appealed

F. ADMINISTRATIVE REMEDIES

WARNING: Prisoners must exhaust administrative remedies before filing an action in federal court regarding prison conditions. See 42 U.S.C. § 1997e(a). Your case may be dismissed or judgment entered against you if you have not exhausted administrative remedies.

Is there a formal grievance procedure at the institution in which you are confined?

☒ Yes ☐ No (check one)

Did you exhaust administrative remedies?

☒ Yes ☐ No (check one)

G. REQUEST FOR RELIEF

State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "G. REQUEST FOR RELIEF."

- 1) I am requesting that the Court vacates or modify the SAMs imposed on me.
- 2) I am requesting that the Court orders Defendants to allow an ENT to come treat me.
- 3) I am requesting that the Court orders Defendants to have a mental Health professional come see me more regularly (at least once a week). And ~~for~~ for that person to speak Spanish.
- 4) I am requesting that the Court orders Defendants to stop blowing hot air into my cell at all hours of the night.
- 5) I also ask that this Court orders Defendants to assign me a tutor to be able to successfully participate in the ESL program or to give me the homework with Spanish instructions.
- 6) I also ask that this Court orders ~~Defendants to~~ to allow me to bypass the Administrative ~~Kennedy Program.~~ ~~7) I ask that this Court orders Defendants to allow me a~~

H. PLAINTIFF'S SIGNATURE

I declare under penalty of perjury that I am the plaintiff in this action, that I have read this complaint, and that the information in this complaint is true and correct. See 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

Joachim Yuzman L.
(Plaintiff's signature)

9/9/24
(Date)

B: Defendant(s) Information

Defendant 4: Merrick Garland; Attorney General of the U.S.

Address: U.S. Dept of Justice

950 Pennsylvania Ave NW

Washington, DC 20530

Defendant #4 is being sued in his official capacity.

D: Statement of Claims

CLAIM ONE: continue

Supporting facts:

Since my extradition, ~~the~~ the defendants have not allowed me to speak to my wife, and say it is because of the SAMs. I have not been able to speak to her through phone, visits or by a letter.

The defendant's imposition of the SAMs ignore the dangers that solitary confinement poses to a person's dignity and sanity.

The defendants have not tailored the SAMs to me specifically. They must be prisoner specific in that each prisoner upon whom SAMs are imposed has a set of SAMs issued for a particular prisoner, based on the circumstances of that prisoner's case. However, the SAMs imposed on me are not specific to me. In fact, many of the measures imposed on me by the government seem designed for a defendant charged with terrorism related offenses.

The ~~government's~~ ^{defendant's} allegations in the SAMs, perpetuate the myths and legends that have surrounded me for years. But the government has never offered any concrete examples of violence toward witnesses or continued criminal activity while in custody.

I have behaved in an exemplary manner in the years that I have been incarcerated in the U.S. The defendants have not provided sufficient justification to public safety to continue subjecting me to these conditions of confinement.

The SAMs isolate me as much as a person could be isolated inside a prison and severely limit my communication with the world. The measures have devastated my relationship with my family in every way.

I have not been able to speak to my wife since 2017. I am not longer allowed to speak to my sister. I ~~am~~ ^{have} not ^{been} allowed to speak to my other sister, Armidas, since 2017. I am not allowed to receive letters from them either. I only get two 15-minute phone calls a month with 2 of my daughters (my twin daughters). And I can only see them when they can come visit me with my attorney. And even then, I cannot even hug them. The visits with my daughters are through a glass. And I cannot hug them. And the entire visit I have shackles.

Most weeks I do not get any exercise time at all. Defendants have decided this.

Also, According to AOMAX Admission and Orientation Handbook, at p. 18, a variety of educational programs and opportunities are offered at the facility. Some of these programs are Adult Basic Education, General Equivalency Diploma, and English as a Second Language. English classes are important to me, because I want to learn it. Only by learning English I can avail myself of other programmatic services, and basic education classes.

Almost all education at AOMAX consists of self-directed study in one's cell, by watching pre-recorded videos on the in-cell tv. There are channels for educational programming. However, the channels broadcast in English only, and therefore, I cannot understand anything that is being said.

I have made repeated requests to Defendant Colli, Defendant Holbrooks and BOP staff at AOMAX to address this situation, but nothing has been done and therefore, I cannot participate in any of these programs.

According to the AOMAX Admission and Orientation Handbook, at p. 18, ~~the~~ an inmate has the right to a "wide ~~and~~ range of reading materials for educational purposes". I wish to take advantage of some of these programs. However, Defendants and their agents are depriving me of my right to participate in these programs by refusing to provide Spanish translations or subtitles.

For example, English as a Second Language is one course offered to inmates at AOMAX. Since my arrival to AOMAX, I have requested personally and through my lawyer to be enrolled in ESL course. BOP staff members and Defendant Holbrooks told my lawyer that this program would be available to me through the in-cell tv. However, this is a lie. The Educational Dept at AOMAX has me enrolled as if I were taking English classes, but that is a lie. The only thing I get is papers in English that I do not know what they say.

Periodically, I receive papers in English with English instructions from the Educational Dept and they say that those papers ~~are~~ are Homework for the ESL program, but I do not understand them as the instructions are in English; the very language I am trying to learn. The papers provide no Spanish explanation and no one comes to explain them to me. I have included copies of these papers here. It is therefore, impossible for me to learn English by way of these papers.

CLAIM THREE: Defendants violated my Eighth Amendment Right to Medical Care and to humane and safe conditions

Supporting facts:

I have asked multiple times to Defendant Colli, Defendant Holbrooks and BOP staff at ADMAX to be seen by an ENT (ear, nose and throat specialist) to treat an allergy that I have had for over 3 years now and it won't go away and my ears, nose and throat are constantly hurting. The medical department has given me medicine for it, but it doesn't work. I have purchased over the counter medicine at the commissary, but it doesn't work either. At this point, I need a specialist to see me. I have told the Defendants through cop out and through my attorney about this issue, and we have requested for a specialist to see me, but Defendants have ignored my requests. I even have filed BP forms addressing this issue. I have even told the prison staff that if they cannot get one, that my attorney or family could pay for one to come see me and treat me. However, this issue has landed on deaf ears.

It is critical that I see an ENT specialist, as this is affecting my quality of life tremendously, and it only gets worse. My face and ears are constantly hurting. I sleep with small pieces of toilet paper inside of my ears to try to alleviate the pain, but it doesn't work much.

I have tried to use the Administrative Remedy Program regarding this issue, but Defendants and BOP staff at ADMAX have made it impossible for me to pursue this path.

For example, I started a grievance process for this issue. On February 8th of 2024, I finally submitted a Central Office Remedy Appeal (BP-11) form, but I have yet to receive a response (I attached this BP-11 form as proof). Quite frankly, I don't think I will get a response either, as I never got responses for the BP-9 or BP-10 either.

I am suffering from severe sleep deprivation as a result of being woken up repeatedly throughout the night, every night by this hot air. This is concerning because I have been treated for high blood pressure, a well-known symptom of sleep deprivation. This ailment, in turn, could also increase the risk of a heart attack or a stroke. And beyond these physical effects, I have been experiencing depression and memory loss, which are also symptoms of severe sleep deprivation.

Defendants are violating my Eighth Amendment Rights to safe and humane conditions and are subjecting me to cruel and unusual punishment. The government acts with deliberate indifference when it knowingly exposes an individual in its custody to a substantial risk of serious harm. The Defendants here know of the risks of serious harm that they are subjecting me but are disregarding those risks by failing to take reasonable measures to abate it.

CLAIM FIVE: Defendants are violating my Eighth Amendment Rights to medical care and safe and humane conditions by refusing for me to get treated by a mental health professional

Supporting facts:

Defendants have made me wait up to five weeks to speak to someone from the mental health department at ADMAX. I have no access to group therapy. Therefore, I have no one to help me cope with the effects and trauma of solitary confinement. Defendant Colli and Defendant Holbrooks and BOP staff at ADMAX have ignored all of my requests for regular visits from a mental health professional.

All the prisoners at ADMAX are visited regularly by someone from the psychology department, except me. I have not seen a mental health professional in over a year, and the few times that someone from the mental health department has come to see me, the visit doesn't last more than five minutes.

CLAIM SIX: Defendants are violating my Constitutional Rights by Making it impossible for me to finish or successfully complete the Administrative Remedy Program

Supporting facts:

I have tried repeatedly to use the Administrative Remedy Program, but the Defendants Holbrooks, Defendant Colli and BOP staff at ADMAX have made it irrational for me to pursue this path.

I have started grievance processes for all the issues raised here, but I have not gotten responses for some BP-8 or BP-9 or BP-10.

As previously indicated, I do not speak English. The BOP prison staff members working on my unit do not or will not speak Spanish to me. Therefore, I often find myself struggling so that they can understand me, and I alone cannot make use of the Administrative Remedy Program. This has frustrated my first Amendment right to petition the government for redress of grievances.

My attorney does and has helped me in the past with some of these, however she does not come every week and by the time she comes again, ~~some~~ so that she can translate the responses to me, the deadline has passed for me to timely file another form of continue the next step in the process. I need to wait for ~~her~~ because the Defendants purposely reply to my BP-8 and BP-9 forms in English and I do not understand, so I must wait for her to come to translate, and by then, it is too late.

I have asked for translations of these to Defendants, but they always ignore my requests.

Guzmanloe *A-509*

The Calendar

1. Look at page 19 in your dictionary. Compare June to December 2001. Which month...?
 - a. has more days _____
 - b. begins on a weekday _____
2. Read Eva's e-mail. Then complete her calendar for April.

Subj: your visit
Date: 4-10-99 12:07:11 EST
From: EvaL@uol.com

Hi Dania! It's Saturday night. I just returned to Miami yesterday. There were no classes for a week so I flew to Chicago last Saturday to visit my parents. Classes begin again on Monday. It's a busy semester. I have English three times a week (Mondays, Wednesdays, and Fridays). I usually have language lab every Thursday, too. Next week, however, there's no language lab—I go to computer lab instead. In addition to English, I'm studying science. Science meets twice a week on the days that I don't have English. And there's science lab on Tuesdays.

Last Sunday, daylight saving time began. Do you have that in Canada? I like it a lot. The days seem much longer.

I'm glad it's the weekend. Tomorrow I'm seeing Tom. (I told you about him in my last letter.) I've got to go now. On Saturdays I go to the gym to work out. We can go together when you come! I'm really looking forward to your visit. Just two weeks from today!

Eva

P.S. Bring your appetite! On Sunday there's a cake sale at the school cafeteria.

1999							April							1999						
S	M	T	W	T	F	S														
				1	2	3														
4	5	6	7	8	9	10														
11	12	13	14	15	16	17														
18	19	20	21	22	23	24														
25	26	27	28	29	30															

3. What about you? Write a letter to a friend. Describe your weekly schedule. Use your own paper.

SEND: 12-11-23 ESL OX INT

4. Look in your dictionary. Write the season.

- a. Tim's birthday spring c. the man and woman's anniversary _____
b. Easter _____ d. the man's vacation _____

5. Read the information. Write the season next to each holiday.

Legal Holidays—U.S. 2006

a. <u>winter</u>	Christmas	12/25	
b. _____	Columbus Day	10/9	(2nd Mon. of the month)
c. _____	Independence Day	7/4	
d. _____	Labor Day	9/4	(1st Mon. of the month)
e. _____	Martin Luther King Jr.'s Birthday	1/16	(3rd Mon. of the month)
f. _____	Memorial Day	5/29	(last Mon. of the month)
g. _____	New Year's Day	1/1	
h. _____	Thanksgiving Day	11/23	(4th Thurs. of the month)
i. _____	Veterans Day	11/11	
j. _____	President's Day	2/20	(3rd Mon. of the month)

6. Look at the chart in Exercise 5. Put the holidays in the correct time order in the columns below. Write the seasons and the months in words.

Date	Holiday
<u>January 1</u>	<u>New Year's Day</u>
_____	_____
_____	_____
_____	_____

Date	Holiday
_____	_____
_____	_____

Date	Holiday
_____	_____

Date	Holiday
_____	_____
_____	_____
_____	_____

7. Look at the chart in Exercise 5. Which months do not have any legal holidays?

March, _____, _____, _____

Challenge Look at the chart on page 182 in this book. Follow the instructions.

SEND: 12-11-23 ESL OX INT

Tools and Building Supplies

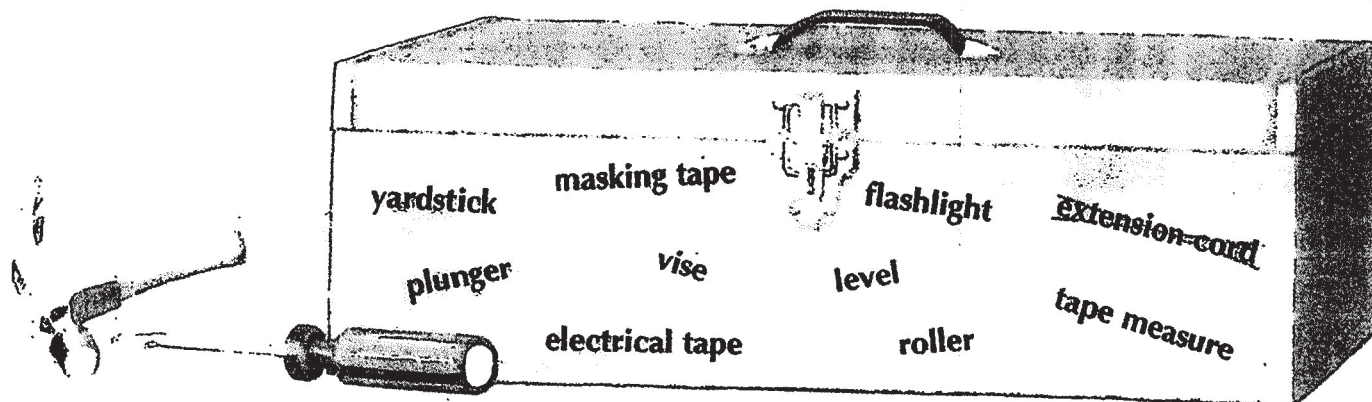
Guzman Loe

H509

1. Look in your dictionary. Cross out the word that doesn't belong. Then write the section of the hardware store.

- | | | | | |
|--------------------|---------------|------------|-------------------|----------------|
| a. <u>hardware</u> | nail | bolt | outlet | screw |
| b. _____ | ax | plunger | pipe | fittings |
| c. _____ | circular saw | hammer | router | electric drill |
| d. _____ | brush | roller | spray gun | chisel |
| e. _____ | wire stripper | drill bit | wire | extension cord |
| f. _____ | hacksaw | flashlight | wrench | mallet |

2. Complete the conversations with the correct words from the box.



- a. Ty: I want to plug in this electric drill, but it doesn't reach the outlet.
Jade: No problem. Use this extension cord.
- b. Ian: I've been painting for hours and I still have three more walls to do.
Tina: Why don't you use this _____? It's faster than a paintbrush.
- c. Lily: Oh, no. The toilet is stopped up again.
Dan: Here. Use this _____. It always works.
- d. Kim: Do you know how long the shelf in the dining room is?
Lian: No. Use the _____ or _____ to find out.
- e. Eva: Help! I could use a third hand here!
Jana: Use the _____ to hold the wood in place.
- f. Jules: Don't get paint on the glass.
Lyle: I won't. I put _____ around the panes before I started.
- g. Nico: That wire doesn't look very safe.
Iris: Don't worry. I'll put some of this _____ on before using it.
- h. Olga: Does this shelf look straight?
Boris: Hmm. I'm not sure. Let's use the _____. Then we'll know for certain.
- i. Enzo: It's so dark behind here. I can't see what I'm doing!
Pia: Give me the OX INT. I'll hold it for you.

SEND: 6-12-23

PLA

ESL

OX INT

FEDERAL CORRECTIONAL COMPLEX
FLORENCE, COLORADO
INFORMAL RESOLUTION FORM

Notice to Inmate: Inmates have the responsibility to use this Program in Good Faith and in an Honest and Straightforward manner.

Inmate Name: Joaquin Guzman Jr. Reg. No.: 89914053
Unit: H Date: 8/12/2023

NOTICE TO INMATE: Be advised, normally prior to filing a Request for Administrative Remedy, BP-229(13), you must attempt to informally resolve your complaint through your Correctional Counselor. Please follow the steps listed below:

1. State your complaint (single complaint or a reasonable number of closely related issues):

de la manera mas atenta le solicito se aplique el
Reglamento de la prision a mi persona ya que todo
preso tiene ese derecho ya que es la jca del preso en la
prision

(If more space is needed, you may use up to one letter size (8 1/2 x 11) continuation page. You must also submit one copy of supporting exhibits, as exhibits will not be returned with the BP-229(13) response.)

2. State what resolution you expect:

Espero que se me aplique el Reglamento
ya que asta el dia de hoy no se a aplicado sigo como el dia
que lleve sin actividades y quiero estudiar

Inmate's Signature: Joaquin Guzman Jr. Date: 8/12/2023

Counselor's Signature: _____ Date: _____

Department Involved: _____ Date Assigned: _____ Due Date: _____

Department's Response regarding Complaint: _____

Department Head Signature: _____ Date: _____

Unit Manager's Review: _____ Date: _____

Informally Resolved: _____ Date: _____

DATE	<u>8/12/23</u>
TIME	
COUNSELOR	<u>[Signature]</u>

UNICOR FEDERAL PRISON INDUSTRIES, INC.
LEAVENWORTH, KANSAS

U.S. DEPARTMENT OF JUSTICE

Federal Bureau of Prisons

REQUEST FOR ADMINISTRATIVE REMEDY

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

From: Joaquín Guzmán J. 89914053 H max
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A- INMATE REQUEST

de la manera mas atenta me dijo a usted para
 manifestarle que labor se me aplique el Reglamento ya que esta
 el dia de hoy no tengo actividades lo unico que estoy recibiendo son tres
 dias a la semana que me sacan a Rec. pero a donde me sacan na da el
 sol ya que las paredes estan muy altas y el lugar muy reducido mide
 al Rededor de 7 pies de ancho por aproximadamente 8 o 9 pies de
 largo a todos los presos de esta unidad H donde me encuentro los
 sacan a Rec. todos los dias y a donde los sacan les da el sol y el lugar
 mide al Rededor de 10 pies de ancho por al Rededor de 18 pies de largo y
 tienen llamada con su abogado cada semana y ami pasan meses y no me
 autorizan llamada por labor aplique el Reglamento

8/27/2023
 DATE

Joaquín Guzmán J.
 SIGNATURE OF REQUESTER

Part B- RESPONSE

DATE

WARDEN OR REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response.

SECOND COPY: RETURN TO INMATE

CASE NUMBER: _____

Part C- RECEIPT

CASE NUMBER: _____

Return to: _____
 LAST NAME FIRST MIDDLE INITIAL

Federal Bureau of Prisons

Type or use ball-point pen. If attachments are needed, submit four copies. One copy of the completed BP-229(13) including any attachments must be submitted with this appeal.

From: Joaquin Guzman Jr 89914053 H max
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A - REASON FOR APPEAL

de la manera mas atenta me dirijo a usted para manifestarle lo siguiente tengo en este lugar al Rededor de 53 meses y asta el dia de oy no se a aplicado el Reglamento de la prision a mi persona asta el dia de oy la unica actividad que estoy Resibiendo tres dias a la semana me sacan a Rec. Con duracion de 2 horas pero a donde me sacan no pega el sol porque las paredes estan muy altas y aporte pusieron Rejas que si pegara el sol a donde me sacan tampoco pegaria el sol bien ya que las Rejillas lo impiden tengo mas de 7 años que llevo
 11/28/2023
 DATE

Joaquin Guzman Jr
 SIGNATURE OF REQUESTER

Part B - RESPONSE

DEC 11 2023

DATE

If dissatisfied with this response, you may appeal to the General Counsel. Your appeal must be received in the General Counsel's Office within 30 calendar days of the date of this response.

ORIGINAL: RETURN TO INMATE

CASE NUMBER:

1183606-K1

Part C - RECEIPT

CASE NUMBER:

Return to: _____
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: _____

DATE

SIGNATURE, RECIPIENT OF REGIONAL APPEAL



1/28/2023

Extraditado a Estados Unidos y está el día de hoy no me
a dado el sol a todos los presos que se encuentran en este
lugar todos los días de la semana los sacan a donde da
el sol y a mí nada más tres días a la semana me sacan y
¿donde me sacan no da el sol usted sabe que todo ser de la
tierra si no le da el sol se enferma sea una planta o
cualquier ser de la tierra es una discriminación sin límite a
mi persona al no darme ninguna actividad no se inglés
y los oficiales que hablan Español no me hablan en Español
y yo no se inglés una toitera muy grande las 24 horas
psicológicamente emocionalmente mentalmente y física
ya que cuando me sacan a visita me ponen unas esposas
que son duras no tienen cadena como las esposas que son
comunes y las esposas que me ponen me lastiman las manos
cuando tengo que firmar algún documento a mi abogada
es un problema a raíz de las esposas que me lastiman las
manos y cuando tengo que revisar documentos de mi
situación jurídica es un problema a raíz de las esposas
que me ponen todos los presos que se encuentran en la
unidad donde yo me encuentro cuando llegan a tener
visita cuando llegan al cubículo de visita les quitan las
esposas de las manos y cuando los regresan a su celda ya se
les vuelven a poner al regreso y las esposas que les ponen a
los demás presos no lastiman las manos ya que son esposas
comunes y todo esto es a raíz de la fiscal que está al frente
de las Reglas same ya que ella lo ha tomado demasiado
personal a mi persona ya que ella inició mi proceso
y yo en las mociones que he echo hego a la corte de
nuevo a cor e exluido a los fiscales que llevaron acabo

mi proceso que hubo muchas anomalías de parte de ellos en mi contra y a raíz de eso la fiscal que está al frente de las Reglas sigue a tomado represalias en mi contra intentando apollandose de los medios de comunicación para justificar las condiciones inhumanas en las que me encuentro desde que llegué a los Estados Unidos así como de 7 años desde mi llegada a los Estados Unidos en este lugar tengo más de 4 años y me han mantenido en condiciones inhumanas una discriminación sin precedente una tortura muy grande de todo tipo una cosa es que mi caso es demasiado político a raíz de la muerte del Cardenal Juan Jesús Posada Ocampo que el Gobierno de México asumió en 1993 culpando a Guzmán de su muerte así como una campaña a través de los medios de comunicación está combatiendo en un Juicio así como ante el mundo entero el nombre malo del mundo y el narcotraficante más grande del mundo luego siguió el Gobierno de Estados Unidos con el mismo cuento usando los medios de comunicación existe la evidencia que así ha sido del testigo número uno del Gobierno Vicente Zambada el dijo eso en el Juicio que los Gobiernos de México y el de Estados Unidos le hicieron una campaña a Guzmán para hacerlo grande y así poder detenerlo demasiado político mi caso le pido de favor que se base en el comportamiento de Guzmán ya que lo fue a través de los medios y ha sido respetado con todo el personal de la prisión no hay una justificación para que me mantengan en estas condiciones que son inhumanas le pido de favor que ablique el Reglamento a mi persona de antemano le agradezco

Regional Administrative Remedy Appeal

Federal Bureau of Prisons

Type or use ball-point pen. If attachments are needed, submit four copies. One copy of the completed BP-229(13) including any attachments must be submitted with this appeal.

From: Joaquin Guzman L 89914053 4 max
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A - REASON FOR APPEAL

de la manera mas atenta me dirijo a usted para manifestarle lo siguiente tengo en este lugar al Rededor de 54 meses y asta el dia de oy no se a aplicado el Reglamento de la Prision a ni persona asta el dia de oy la unica actividad que estoy recibiendo tres dias a la semana me sacan a Rec con duracion de 2 horas pero a donde me sacan no pega el sol porque las paredes estan muy altas y aparte pusieron Rejas que impide el sol a donde me sacan tampoco pegoria el sol bien a que las Rejas lo impedirian tengo mas de 7 años que llevo

13/10/24
 DATE

Joaquin Guzman L
 SIGNATURE OF REQUESTER

Part B - RESPONSE

DATE

If dissatisfied with this response, you may appeal to the General Counsel. Your appeal must be received in the General Counsel's Office within 30 calendar days of the date of this response.

REGIONAL DIRECTOR

FIRST COPY: REGIONAL FILE COPY

CASE NUMBER: _____

Part C - RECEIPT

CASE NUMBER: _____

Return to: _____
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: _____

DATE

SIGNATURE, RECIPIENT OF REGIONAL APPEAL

2/6/2024

persona para poder tener actividad quiero estudiar para aprender inglés ya que los oficiales no me ablan en Español los que saben Español y yo no sé inglés es una tortura muy grande las 24 horas de todo tipo no saber inglés no solo que dicen los oficiales y oye que los que ablan Español no me ablan en Español si yo les ablo ellos me contestan en inglés a sido demasiado difícil para mí asta el día de oy el idioma si me dan algun escrito me lo dan en inglés no se que decir y nunca viene una persona de la institución a verme para ya saber que dice es una discriminación sin precedente yo miro seguido en la televisión en telemundo o en univision que son los canales que me pusieron en Español los demas canales que me pusieron estan en inglés y como no sé inglés miro nada mas esos 2 canales y seguido veo al señor presidente Biden que abla en esos 2 canales Refiriendose a la discriminación al Racismo que Esta en contra de la discriminación y del Racismo Estoy seguro que usted piensa igual que el señor presidente Biden una persona humana eso me queda claro sino el señor presidente no la hubiera en su gabinete y le pido el gran favor que me ayude a como indica el Reglamento que lo aplique a mi persona para que mi familia pueda

Resibir costa cuandomenor cada mes y
mi familia allagada mis 2 hermanas mis
hermanas mis hijos le e Escrito a mis 2
ninas de escasos 12 años y a mi hermana
que son las unicas que me dieron permiso
de escribir duran asta 10 meses en Resibir
costa lo mas Rapido que an llegado a Resibir
son 5 meses la fiscal fue Esta al frente de las
Reglas y tomado muy personal todo en mi contra
y todo por la Rason que los Escritos que e echo
llegar a la corte e exhibido las anomalias
que liberon a cabo en mi contra los fiscales
de mi caso y ella fue la que inicio el proceso
me a mantenido en condiciones que son
inhumanas asta el dia de oy intentando
apollandose en los medios de comunicacion
para no autorizar ni siquiera llamada
telefonica con mi abogado todos los presos
que estan en la caridad donde yo me
encuentro estan Bajo las Reglas same
igual que yo y tienen llamada con su abogado
y con su familia una llamada telefonica cada
semana el unico soy yo nada mas que no me
autorizan llamada demasiado personal na ay
justificacion yo soy respetoso con todo el personal
le pido el gran favor que aplique el Reglamento de antemano
le agradezco

¿quien es quien?

U.S. Department of Justice

Federal Bureau of Prisons

Type or use ball-point pen. If attachments are needed, submit four copies. One copy each of the completed BP-229(13) and BP-230(13), including any attachments must be submitted with this appeal.

From: Joaquin Guzman L. 89914053 H max
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A - REASON FOR APPEAL

de la manera mas atenta me dirijo a usted por la P 9 aquí en la institución y a principios de la P 8 luego escribi en Kansas City la P 10 ya pasaron 4 meses y no tengo respuesta se trata de que desde que llevo a Estados Unidos hace mas de 7 años me pego alergia en la nariz y me comensaron a doler los oidos a raíz del ruido que producen los aparatos del aire y el ruido del ducto por donde sale el aire en la sala para los oidos, compro tapones para los oidos en la comisionaria

2/8/2024
 DATE

Joaquin Guzman L.
 SIGNATURE OF REQUESTER

Part B - RESPONSE

DATE

GENERAL COUNSEL

FIRST COPY: WASHINGTON FILE COPY

CASE NUMBER: _____

Part C - RECEIPT

CASE NUMBER: _____

Return to: _____
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: _____

DATE

SIGNATURE OF RECIPIENT OF CENTRAL OFFICE APPEAL

9/8/2024

y en la noche me pongo los tapones en los oídos para poder dormir y para la alergia de la nariz compro medicamento en la comisaria pero no me ase provecho no me quita la alergia aquí en la institución me an dado medicamento pero no me ase provecho no me quita la alergia y como ya tengo mas de 7 años con la alergia ya me duele asta la frente parte de la cara mi nariz siempre me está doliendo desde que llege a la prision ya ase mas de 4 años e ablado tanto personal como por escrito con los jefes de la prision que an Estado en la prision y el jefe actual tambien que por favor me autorisen del Exterior un especialista para que me venga a Revisar mis oídos y mi nariz que los gastos del Especialista mi abogado los paga pero asta el dia de oy no me an autorizado un Especialista en oídos y nariz del Exterior por esa Razon en agosto escribi la P8 y la P9 aquí en la institución como no tube Respuesta escribi la P10 a la Region a principios de octubre ase ya 4 meses y como no e tenido Respuesta de la Region por esa Razon me heo abligado a Escribir la P11 a Washington disculpe que lo moleste pero no me queda otra otra opcion ya que estoy muy mal

de mi nariz y mis oídos le pido el Gran
Favor que me autopsie en Especialista en nariz
y oídos del Exterior para que me revise y el
Especialista ya diga que medicamento ay que
comprar por lo que cuesta la medicina y el
Especialista no ay problema mi abogada pagara
los gastos usted puede checar en la institución
y se dona cuenta que cada semana estoy comprando
medicamento para la alergia y aquí en la
institución también me an dado medicamento
para la alergia de la nariz y como ya tengo mucho
tiempo con la alergia ya se me iso crónica

de antemano le agradezco
Joaquín Guzmán L.

no le ago llegar copias ni original de la p 8
ni de la p 9 ni de la p 10 ni copias por la Razon que no
me an entregado de la Region de Regreso ni copias ni
~~original~~ original le pido el Gran Favor que me autopsie el
Especialista ya que me encuentro bastante mal
de salud a Rair de la alergia y mis oídos
gracias

Name: James J. Jaramila
Reg No: 80214053
U.S. Penitentiary MAX
P.O. Box 8500
Florence, CO. 81226-8509
cm 24-89914053-0026-mo-047

Corre Especial Office of the Court
United States District Court
Alfred A. Gray Courthouse
901-19th St. Room A105
Denver CO. 80294-3589



