

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

C.G.B., *et al.*

Plaintiffs,

v.

CHAD WOLF, *et al.*

Defendants.

Case No. 1:20-cv-01072-CRC

**NOTICE OF FILING REDACTED EXHIBITS**

Pursuant to the Court's Minute Order of April 24, 2020, Petitioners hereby submit redacted versions of the declarations filed under seal as Exhibits 1-13 to their Motion for Temporary Restraining Order (Dkt. 4).

April 23, 2020

Respectfully submitted,

/s/ Matthew E. Kelley

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*Counsel for Petitioners*

# Exhibit 1 to TRO Motion (C.G.B. Declaration)

I, [REDACTED], declare as follows:

1. My legal name is [REDACTED]. My true name is [REDACTED]. I was born on [REDACTED] and am a citizen of Mexico.
2. I identify as transgender. I am seeking asylum because I fear persecution in Mexico as a transgender woman.
3. I am currently detained in Florence Detention Center in Arizona. I have been detained here since January 2020.
4. I am not currently represented in my immigration case. My next hearing is a master calendar hearing on [REDACTED]. I had a bond hearing scheduled for [REDACTED], but it was cancelled because all hearings at Florence Immigration Court were cancelled that week due to the confirmed cases of COVID-19 at Florence.
5. If I am released, I would hope to stay with [REDACTED], a volunteer from Trans Queer Pueblo, which is an organization of LGBT immigrants of color. [REDACTED] is a U.S. citizen.
6. Until recently, I was held in the Alpha pod. Alpha pod has one big sleeping room with about 64 beds. They are bunk beds and are spaced about 3 feet apart.
7. On or about April 2, 2020, the person in the bunk above me began coughing a huge amount in the night. He also had a temperature and a sore throat. He was new to Alpha pod so he didn't know the process to see the doctor until the other detainees told him. Then he requested a medical appointment. On April 7, 2020, the doctor checked him and gave him pills for his throat and his cough, but left him in Alpha pod. He continued coughing for the next two nights.
8. On April 9, 2020, I began to experience coronavirus-like symptoms. I had a temperature, was throwing up, and had pain in my throat, head, and bones. I was also losing hair. I went for a medical appointment. The nurses took my temperature; it was high. The nurses told me I had symptoms that were like coronavirus and they called the doctor. He took my temperature too. Then they gave me a coronavirus test and said the results would come out in 3 days, but they have not given me the results.
9. After the appointment, I was taken to a place with other people who were showing symptoms of coronavirus. I stayed there for approximately 3 days. I was afraid.
10. On April 12<sup>th</sup>, I was transferred to Echo pod, where they quarantine people who were or are sick. There are twelve people in Echo pod, two of whom have tested positive for coronavirus.
11. I have received no information from staff at the detention center about COVID-19.

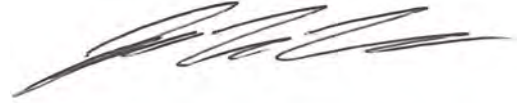
12. In Echo pod, guards have told me that I can receive mail and use the phone, but I cannot send mail. They haven't told me when I will be able to start sending out mail again.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on:

April 21, 2020

Date



Signed by Joshua D. Bendor on behalf of  
[REDACTED] with her  
oral authorization and permission.

## Exhibit 2 to TRO Motion (A.F. Declaration)

I, [REDACTED], declare as follows:

1. My legal name is [REDACTED]. My true name is [REDACTED]. I was born on [REDACTED] and am a citizen of Nicaragua. My alien number is [REDACTED].

2. I identify as transgender. I am seeking asylum because [REDACTED]. I have not completed my application for political asylum yet, but I plan to file as soon as I can.

3. I am currently detained in La Palma Correctional Center in Arizona. I have been detained at La Palma since January 9, 2020. La Palma is the only detention center at which I have been housed since my arrival in the United States.

4. I was represented for bond in my immigration case by [REDACTED], an attorney with a private Phoenix-based law firm. My family communicated directly with her. Ms. [REDACTED] visited me once, but due to COVID-19, she has not been able to visit me a second time. [REDACTED], during my bond hearing, she participated via telephone.

5. My next Master Calendar Hearing is on [REDACTED], with Judge [REDACTED]. My bond is set at [REDACTED], but my family cannot afford to pay.

6. If I am released, I would stay with my cousin, [REDACTED], in San Francisco, California. [REDACTED] is a United States citizen [REDACTED]. I have also made community connections in Arizona via Trans Queer Pueblo (an LGBTQ advocacy group). While in detention in La Palma I met two friends from Cuba, both of whom were released and live in Arizona. If released, I would promise to go to all of my hearings and continue to seek political asylum.

7. I have no prior criminal history.

8. I was born with only one kidney and, according to the doctor at La Palma who I visited two weeks ago, I am healthy but could succumb quickly to infection because of this condition. The doctor told me to “drink a lot of water” to avoid infection. I have never been on dialysis or taken medication in the past, but I have been warned that if I do not take care of my kidney, I could get Chronic Renal Insufficiency (kidney failure). This condition has caused me pain in the past.

9. La Palma staff have done very little to educate or inform those of us who are detained about COVID-19. Mostly, they have put up some small posters with information posted around the facility. The posters are in Spanish and English. I have learned about COVID-19 mainly from the news on the television at La Palma. The “fixed” station is always in English, but when the guards are distracted, some detainees change the TV channel to Telemundo or Univision, in Spanish. Then we can understand the news better. When the guards get focused again, they change it back to the English station. Detainees do not get punished for changing the channel; it just gets changed back to English. I understand that it is a virus that spreads easily on clothes, between people, in saliva, and various other ways.

10. When those of us who are detained ask the La Palma guards about COVID-19, we are told that they “are not going to answer any questions that have to do with the coronavirus.” The guards refuse to give us information when we ask. I have received no in-person information about the

virus from the guards or the La Palma detention center. I have the impression that they want to avoid the subject.

11. I have heard from other detained people that there are between seven and eight detainees at La Palma who are infected with COVID-19, but we have not received a formal announcement from the La Palma staff about it. I have heard there are people isolated due to a COVID-19 infection but, to my knowledge, no one in my tank (living quarters) has been tested, including myself.

12. I am worried about the spread of COVID-19 because we are not able to keep our distance from other people in the detention center. Meals continue to happen in large groups of between 100–120 people. We all eat at the same time. Although we are encouraged to sit apart while we eat, there is no way to stay six feet apart while we are in line for food. The tables are all connected so the furthest we are able to sit apart is about one foot. I have not seen any new precautions during mealtime related to COVID-19.

13. There is also not enough room in the other parts of the facility to stay six feet apart from everyone. I sleep in my cell alone because I am transgender, but there are about 120 people in my tank and about half of us (60 people) go out to the patio at a time. The patio is not big enough for us to remain six feet apart. For recreation, the library is closed and there are no more church services.

14. We do not have free access to hand sanitizer or soap. There has never been hand sanitizer and soap must be bought from the commissary. Instead, we are only given shampoo, which I use to wash my hands. I also use the shampoo to wash my clothes in the sink of my cell as I am afraid of them getting mixed with an infected person's clothing in the laundry.

15. The detainees did not have access to protective face masks until April 14, 2020. At first, the guards would only give us a mask if we agreed to sign a form. I did not see the form and I am not sure what it said or what language it was in. To my knowledge, everyone refused to sign the form, including myself. No one would sign, so the guards took the masks away that day. Then, on April 14, the guards came back with the masks and let us take one free mask without signing the form. Everyone took a mask, but we were not informed on how to use or place the mask. I was told, "you only get one. If you damage it, we will not give you another one." I have never been given gloves.

16. It usually takes three days to see a doctor but can at times take a week. To get a medical appointment, you must make a request and you are put on a list in order to be seen. I have had four in-person medical appointment since arriving at La Palma in January 2020, one doctor visit and three psychologist visits. Neither of the doctors used masks or gloves during any of the appointments. My friend in La Palma had a fever and signs of the flu. When my friend asked to see the doctor, my friend was told to follow the normal procedure: make a request and fill out the form to be seen.

17. I have never seen the La Palma staff wear gloves or masks, which also makes me concerned about the spread of COVID-19. The guards do not wear masks or gloves when they pat down the detainees after visitations. The guards inspect our cells and belongings about twice a week, but no gloves or masks are worn. I have never seen the guards wash their hands or use hand sanitizer.

18. I need hormone therapy to feel well, but I have not been able to receive treatment since my detention at La Palma. I was on hormone therapy for a year and a half in Nicaragua before arriving in the United States. By the time I got to La Palma, I had run out of my medication. I explained this to a nurse in La Palma, who told me to, "make a request." I never got the medication. Later, I ran into a different nurse when I was on my way to the cafeteria. I pulled the nurse aside and said, "I was taking hormones and I need them again." The nurse took my name and A number, but there was no follow up.

19. After I arrived at La Palma, I became depressed. I obtained a medical appointment with a psychologist, but the psychologist told me that I am "fine" and not depressed. However, my depression got worse and I started having suicidal thoughts. This led to my forced segregation for two and a half days in February 2020. I need to see a psychologist on a regular schedule and have requested this from La Palma. I was told I would have to put in a separate request each for each visit and would be placed on a list. I have only seen the psychologist three times.

20. I continue to suffer from depression, and I do not feel that my mental health is being adequately handled. Because of my kidney condition, I am at risk of infection and afraid for my health, so I stay in my cell, where I am housed alone, because I do not feel safe or conformable around others. My depression is made worse by the way people in detention treat me. No one understands what it means to be transgender or how to use the proper pronouns. They call me "he" and say, "there are no women here." I am fighting hard against depression. I try to sleep instead of thinking about heavy things because I cannot afford to let my depression take over. My worst fear is getting sick in here because it means I will have to spend more time in detention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on:

April 21, 2020

Date



Signed by Payslie M. Bowman on behalf of  
[REDACTED] with her oral  
authorization and permission.



## Exhibit 3 to TRO Motion (M.M.S-M. Declaration)

**RESPONDENT'S PERSONAL DECLARATION**

I, [REDACTED], a/k/a [REDACTED], hereby state under penalty of perjury that the following statements are true and accurate to the best of my knowledge and belief:

**BIOGRAPHIC INFO & GENDER IDENTITY**

1. My name is [REDACTED]. I am a transgender woman. I was born in El Salvador on [REDACTED]. My A number is [REDACTED].

**IMMIGRATION & DETENTION HISTORY**

2. I fled El Salvador because many people in the LGBT community are murdered and the government does nothing to protect us.
3. I have applied for asylum, withholding of removal, or protection under the Convention Against Torture as I fear torture or persecution if returned to El Salvador. I understand that the only way for me to remain in the United States is if I appear at all my court hearings and comply with any additional release requirements.
4. My case is currently being appealed to the BIA.
5. I have sponsors who are citizens who could take me in if I were to be released.
6. I have been detained for 11 months and three weeks. I have been detained at Tallahatchie, La Salle, and Winn Correctional Center. I am currently detained at Winn Correctional Center.
7. I have not been transferred recently, however on April 4, 2020, an ICE official named Julio here at Winn told me that they were working on my transfer to another detention center that would be better for me. Julio told me that the sexual harassment that I have experienced here at Winn is serious and that they are looking for a better situation for me.
8. While in detention I have been sexually harassed, and assaulted, by cisgender male detainees.

**MEDICAL HISTORY**

9. I am [REDACTED] years old.
10. I do not smoke.
11. I am depressed, and my head, back, neck, and legs all hurt.
12. I was taking hormones in El Salvador, but I have been unable to access gender conforming medical care while in detention despite multiple requests.

13. I am taking an antidepressant and a sleeping pill, both of which were prescribed while I have been in detention.
14. I believe that because I am not receiving my hormone treatment that is why I am suffering so deeply from depression and anxiety attacks. I am not receiving the proper care and treatment I need.
15. There are some days when the nurses do not give me my medication. Even though the prescriptions state that I am to take my medications once a day, every day.
16. Part of my depression come from my proximity to lots of men. [REDACTED]  
[REDACTED]. Until recently I was detained with around 40 cisgender men.
17. 15 days ago I was placed in segregation by myself. Segregation is not good for my anxiety or depression, I can feel my conditions worsening.

#### **COVID-19 CARE & CONDITIONS AT WINN**

18. I know from watching the news that COVID-19 is an illness of a large magnitude and it is very contagious.
19. I have not had any news in 15 days. I do not have access to a TV in segregation and cannot talk much to other detainees.
20. The only information or education on COVID-19 I have received from any guards or other staff, either before or during segregation, came from Julio, an ICE officer, who told me that you have to wash your hands and wear masks and gloves. As a detained person, I do not have access to masks or gloves.
21. The nurses do not use gloves or masks. The medical staff and guards have not told us anything about COVID-19.
22. I do not know if guards or detainees are being tested for COVID-19.
23. I have soap, but no disinfectant, no masks, and no gloves.
24. My shirts are washed every day, my pants are washed every other day, and I wash my underwear by hand every day.
25. I have seen guards wearing gloves, but only in the area where Court is. Otherwise they do not wear gloves or masks.
26. The guards come in to pat me down one to three times a day. The guards do not wear masks or gloves. The majority of the time, the guards that pat me down are cisgender

men. Though I am in segregation it is impossible for me to socially isolate.

27. There is always a guard about one meter from my room watching me because I am in segregation. The guards standing in front of my room are never wearing masks or gloves. Even if I was not searched daily it would still be impossible for me to keep socially distant.
28. I am seen in medical twice a month. Last time I went the medical providers were not wearing masks or gloves.
29. From my time being housed with the cisgender men, if a person is sick the person can go to the medical unit and they continue sleeping in the dorms with everyone else.
30. The cisgender men are kept in a room with 44 or so people. The beds are 1.5 meters apart. They share 1 bathrooms with 3 sinks and 3 toilets. They eat at the cafeteria with 52 people, 4 persons to a table.
31. That dorm is swept once a day by detainees. That is all the daily cleaning that is done in the dorm.
32. My cell in segregation is cleaned by me 1-2 times a week. I have to depend on officers bringing me cleaning solution in order to clean it and that is why the cleaning schedule varies..
33. I fear of contracting COVID-19 because of the lack of hygiene and protection here at Winn Correctional Center.
34. I have authorized Sarah Sanchez, legal assistant with Santa Fe Dreamers Project, to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I, Sarah Sanchez, state the following under penalty of perjury pursuant to 28 U.S.C. § 1746: My name is Sarah Sanchez. I am a legal assistant with Santa Fe Dreamers Project.

Out of necessity in light of the COVID-19 pandemic, I was unable to meet [REDACTED] in person. Therefore, I signed [REDACTED]'s declaration on her behalf and with her express consent.

I spoke with [REDACTED] via telephone and read her the entire text of the declaration on April 17, 2020. [REDACTED] confirmed that all of the information in the declaration is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

  
Signature

## Exhibit 4 to TRO Motion (L.R.A.P. Declaration)

I, [REDACTED], declare as follows:

1. My legal name is [REDACTED]. My true name is [REDACTED]. I was born on [REDACTED]. I am a citizen of Mexico. I came to the United States when I was three or four years old.
2. I identify as transgender. I am seeking asylum because I fear persecution in Mexico as a transgender woman.
3. I am currently detained in La Palma Correctional Center in Arizona. I have been detained in La Palma since December 16, 2019.
4. I am represented in my immigration case by [REDACTED] of the Florence Project. I communicate with her by phone. I filed my asylum application on [REDACTED]. I have an individual hearing set for [REDACTED]. I have requested parole and a bond. I am awaiting a decision on both requests.
5. If I am released, I would stay with my family, including my grandfather who is a legal permanent resident. I would promise to go to all of my hearings and continue to seek asylum.
6. The staff at La Palma have not told us anything about COVID-19. There are signs about COVID-19, but they are only in English. I speak English, so I can understand them, but most of the other detainees cannot. The signs say to do basic things like wash your hands, keep your distance from people, and if you're sick, stay in.
7. I know almost nothing about whether other detainees have COVID-19. I think that some have, but that is only based on rumors. I have not heard of any detainees being tested for COVID-19.
8. It is impossible to keep six feet away from other people here. I am the only person in my cell, but each cell normally has two people. We no longer go to the lunchroom to eat, but we still eat together at tables, a foot or less away from each other. And we still congregate together, whether it is to get ice, use the microwave, or watch TV. There is just no way to stay six feet apart.
9. We do not have soap or hand sanitizer. If you want soap, you have to buy it. They did give us shampoo. I have some money, so I was able to buy soap, but many people can't. If you can't buy soap and want to wash your hands, you have to use the shampoo. The shampoo isn't very good; it doesn't even work well to wash your body or hair.
10. If you're going to court, they give you a face mask for that one time. But they don't tell you how to use it.
11. We are allowed to do laundry twice a week for the uniform and three times a week for the white clothes (underwear and sheets). They give us two pants and two shirts for the uniform. So our clothes are often dirty, but we have to wear them.

12. The guards and staff in the pod do not wear masks or gloves. I have not seen them wash their hands or use hand sanitizer.

13. I am very depressed, stressed, and panicked. My anxiety is through the roof. Throughout my detention, including during the coronavirus crisis, I have been verbally assaulted, intimidated, and insulted with homophobic slurs by other detainees, guards, and managers. Soon after I got here, I tried to talk to the psychologist about this abuse, but she said that she couldn't do anything for me because we "aren't big on trans rights here." The one other time I was able to see a psychologist, it was for only a 5 or 10 minutes.

14. Sometimes when we shower, the other detainees bang on the doors with a bucket and call us names to intimidate us. They call me "maricon," which means faggot. I told the corrections officers, but they don't take it seriously. On a couple of occasions, the guard let people in the room while we (transwomen) were still showering. That terrified me.

15. A few days later, I told a manager what was going on with the men yelling at us and calling us names, and she dismissed it as not a big deal. Later, the same manager called me a "trannie." When I told another manager, she called me a "trannie" too. A corrections officer said she didn't like the unit I'm in now because there are a lot of "jotos," which is another word for faggots. All of this makes me feel unsafe.

16. Sometimes, they do not let us shower. With the coronavirus, I want to make sure to shower. I have filed three or four grievances about being unable to shower. There is also a lot of bad mold in the showers.

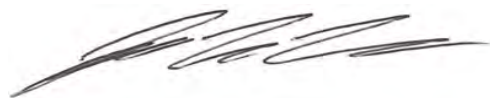
17. If I am not released, I am worried that I could get sick. I also worry that I am in danger because the transphobia and homophobia is really bad here. I feel hopeless.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on:

April 21, 2020

Date



Signed by Joshua D. Bendor on behalf of  
[REDACTED] with her oral  
authorization and permission.



## Exhibit 5 to TRO Motion (K.S. Declaration)

**RESPONDENT'S PERSONAL DECLARATION**

1. [REDACTED], a k a [REDACTED], hereby state under penalty of perjury that the following statements are true and accurate to the best of my knowledge and belief:

**BIOGRAPHIC INFO & GENDER IDENTITY**

1. My name is [REDACTED] I am a transgender woman. I was born in Jamaica on [REDACTED]  
[REDACTED] My A number is [REDACTED]

**IMMIGRATION & DETENTION HISTORY**

2. I fear to return to Jamaica. Jamaica is very dangerous for transgender and homosexual individuals. I have received death threats from my family because I am transgender. The government does not protect transgender Jamaicans.
3. I am applying for protection under the Convention Against Torture as I fear torture or persecution if returned to Jamaica. I understand that the only way for me to remain in the United States is if I appear at all my court hearings and comply with any additional release requirements.
4. My CAT case is being appealed to the BIA. I do not currently have a Court date.
5. In [REDACTED] I was convicted of [REDACTED] in [REDACTED].
6. I was detained on or about March 27, 2019. I was initially detained at Nevada Souther. In August 2019 I was transferred for two weeks to Nye County and then returned. I am currently detained at Nevada Southern Detention Center.

**MEDICAL HISTORY**

7. I am [REDACTED] years old.
8. I do not smoke.
9. I contracted HIV in 2013.
10. I am taking antiretrovirals and my HIV is currently controlled and undetectable.
11. My bloodwork is checked every three to four months.
12. I receive my medication once a day and can take it when I choose. However, it is sometimes a fight to get my medication as the nurse do not always have it. The nurses do not wear gloves or masks when delivering medication.

13. At the beginning of April 2020 I was prescribed hormones for gender affirming care. I was taking hormones before being detained, but this was the first time in one year that I was able to access hormones while in detention.
14. I know that changes in hormone prescriptions can weaken the immune system, but the prescribing doctor did not mention any side effects.
15. About two months ago I was prescribed Vistaril, an anti-anxiety medication. My anxiety has gone up since being detained, and has recently increased due to COVID-19.

### **COVID-19 CARE & CONDITIONS AT NEVADA SOUTHERN**

16. I know that COVID-19 has some similarities with the flu, however it is extremely dangerous especially for medically vulnerable people. On March 27, 2020 I had a family member die from COVID-19.
17. From my family and from the news I know that social distancing is required to stay safe from COVID-19, and that hand washing is also very important.
18. Around the end of March 2020 an official came into the dorm where I am detained and gave a brief presentation about COVID-19. He said that we must wash our hands and report if we get sick. He said that staff were being checked for fever before they came in every day. He only spoke in English but did have a detainee translate into Spanish for him. He was not wearing gloves or a mask.
19. During the presentation the official said that staff would be wearing masks and that masks would be available to detainees. We were told that we could volunteer to make masks for the whole facility.
20. Two days ago, on April 15, 2020 we were told that one person at Nevada Southern has COVID-19, and that they had not told us for five days. Yesterday, April 16, 2020 we were given cloth masks.
21. As of today, April 17, 2020 most staff and most detainees are not wearing their masks.
22. When I saw the doctor at the start of April, when hormones were prescribed to me, COVID-19 was not mentioned during the medical appointment.
23. There is a sign by the microwave that says to wash your hands. It is in English and Spanish.
24. I am detained in dorm [REDACTED] with 45 to 50 people. There are two transgender women in the dorm, the rest are cisgender men. There are two other dorms in the facility, one other for

men, and one for women.

25. I have not been violently harmed by any of the cisgender men, but a few nights ago night there was a rumor I was offering oral sex. This was not true. I see messages written on the bathroom wall about us transgender women. We are always being talked about by the cisgender men, so we try to keep to ourselves for safety.
26. At the start of the pandemic three elderly men were removed from the unit, no one knows what happened to them, one was diabetic.
27. I do not know of anyone being tested for COVID-19 here, and certainly not in my dorm. I do not know if the one person here who is confirmed was already tested before arriving or was tested here. A number of people were transferred to Nevada Southern at the same time as the person with COVID-19. They are all in quarantine together. I was told they are not being tested for COVID-19 as they have not reported symptoms.
28. Guards bring us food to eat in the dorm, at small tables that can seat four people.
29. I buy my own shampoo, and the facility does have a bar of soap for those that cannot afford to buy their own. We cannot buy hand sanitizer, gloves, or disinfectant.
30. Even after masks were distributed, I have seen only one guard and one nurse wearing a mask, guards do not wear gloves, they do not socially distance.
31. It is impossible to socially distance in my dorm.
32. The floors are mopped once a day, the tables are cleaned after each meal, but the gym area of the dorm is still being used and I do not know if it is ever cleaned.
33. Detainees are paid one dollar a day to do the cleaning.
34. We are not let out of the dorm except to go to Court or to medical.
35. With the pandemic I am terrified for my life.
36. I have authorized Charlie Flewelling, staff attorney with Santa Fe Dreamers Project, to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I, Charlie Flewelling, state the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Charlie Flewelling. I am a staff attorney with Santa Fe Dreamers Project.
2. Out of necessity in light of the COVID-19 pandemic, I was unable to meet [REDACTED] in person. Therefore, I signed [REDACTED]'s declaration on her behalf and with her

express consent.

3. I spoke with [REDACTED] [REDACTED] via telephone and read her the entire text of the declaration on April 17, 2020. [REDACTED] confirmed that all of the information in the declaration is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to be "Mr. Ford", written over a horizontal line.

Signature

## Exhibit 6 to TRO Motion (K.M. Declaration)



**RESPONDENT'S PERSONAL DECLARATION**

- I, [REDACTED], a/k/a [REDACTED], hereby state under penalty of perjury that the following statements are true and accurate to the best of my knowledge and belief:

**BIOGRAPHIC INFO & GENDER IDENTITY**

1. My name is [REDACTED]. I am a transgender woman. I was born in Haiti on [REDACTED]. My A number is [REDACTED].

**IMMIGRATION & DETENTION HISTORY**

2. I fear to return to Haiti because there is a great deal of violence towards transgender people in Haiti and the government offers no protection from this violence. [REDACTED]
3. I am applying for asylum, withholding of removal, or protection under the Convention Against Torture as I fear torture or persecution if returned to Haiti. I understand that the only way for me to remain in the United States is if I appear at all my court hearings and comply with any additional release requirements.
4. My case is currently before the BIA, and I believe that I do not have a Court date currently.
5. I do have a conviction for [REDACTED] in [REDACTED] in [REDACTED].
6. I was detained on or about March 27, 2019. I have been detained at Nevada Southern Detention Center for the entire duration of my detention.
7. If released I will live with my father, [REDACTED], who is a US citizen.

**MEDICAL HISTORY**

8. I am [REDACTED] years old.
9. I do not smoke.
10. I am HIV positive. I contracted HIV about 10 years ago.
11. I am taking antiretrovirals which were begun when I was detained. My HIV is currently at an undetectable level. My blood is checked every three to four months.
12. Since being detained I started having anxiety attacks. Everything was black, like I was trapped alone, and when people are there, I feel like they are coming to get me. I was prescribed an antianxiety medication seven months ago, which helps during the day but I still feel the anxiety at night and often cannot sleep as a result. In January 2020 I asked

medical for stronger medication, but my request was denied.

13. I have been taking gender affirming hormones for about 20 years, and I have had access to hormones while in detention.
14. Guards bring me my medication twice a day in the dormitory where I stay. Sometimes the guards do not have my medications and I must go without. I spoke with the doctor who said that I cannot miss any dosages, but that delivery is out of his hands. When the guards give me medication they do not wear masks but they do wear gloves.
15. I have filed five or six grievances in my one year of detention, all have been about not receiving my medication.

### **COVID-19 CARE & CONDITIONS AT NEVADA SOUTHERN**

16. I know that COVID-19 can be deadly especially for people who are older and people with medical vulnerabilities. I know that to avoid COVID-19 we are supposed to wash our hands and observe social distancing of at least 6 feet between people at all times. I learned this from watching the news.
17. I have not received any information on COVID-19 from guards or any other detention staff.
18. I understand there was a short COVID-19 presentation in my dorm about three weeks ago. I was asleep in my bunk during the presentation because it was early in the morning. There was no attempt made to wake me. I understand that other detainees also missed the presentation because they were asleep. I do not believe there have been any other presentations.
19. There are signs about washing our hands that have been put up, but they say nothing about social distancing.
20. I sleep in a dorm with 46 people. I am one of two transgender women in the dorm with 44 cisgender men.
21. They are still bringing in people here. On or about April 12, 2020 approximately 100 people were transferred into Nevada Southern. At least one of the new transferees was positive for COVID-19. All of the transferees are currently in quarantine.
22. We sleep in bunk beds that are close enough together that I can reach across the aisle and touch the next bed.
23. There is one bathroom with eight sinks and eight toilets that we all use.



24. Laundry is done daily.
25. Cleaning in the dorm is done by detainees who are paid one dollar a day. They mop the floors once, clean the eating surfaces after each meal, and clean the bathroom sometimes. The bathroom usually smells like pee.
26. We eat on small tables. The tables have four chairs around them, but there is not enough room to fit four food trays on the table without stacking them.
27. We never leave the dorm, except to go to medical or to Court, but this is how it has always been.
28. Once the COVID-19 pandemic started, guards removed three detainees who were each over the age of 65. I do not know if they are being isolated, if they are sick, or if they have been released.
29. Some people are sick in my dorm. They are coughing and some have a fever. These sick people have been taken to medical and then return to the dorm within one to two days. When detainees return from medical, they do not have gloves or masks.
30. We have soap that can be purchased from the commissary. We do not have disinfectant, we do not have gloves, we did not have masks.
31. Yesterday, April 16, 2020 staff gave all detainees in my dorm face masks. However, none of the detainees or staff that I have seen are wearing masks. They are hand made cloth masks.
32. I wanted to make my own mask, but I did have the materials to do so. I wear the cloth mask that I was provided yesterday.
33. The guards only wear gloves when they are inspecting personal property every few days. Other than that, I have not seen any guards wearing gloves. Guards do not wear gloves when they pat us down on leaving or returning from medical or Court.
34. I have seen one staff member wear a mask in the medical unit, but that was it, even other staff in medical do not wear masks. I have never seen a guard wearing a mask.
35. We do not have hand sanitizer, and generally the staff do not have hand sanitizer. I have seen one guard use hand sanitizer at night. I have seen him use it multiple times, he uses a small bottle that he keeps in his pocket.
36. It is impossible to keep socially distant in this detention facility.
37. I have HIV and am medically vulnerable. I believe I will die if I get COVID-19 in detention.

38. I have authorized Charlie Flewelling, staff attorney with Santa Fe Dreamers Project, to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I, Charlie Flewelling, state the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Charlie Flewelling. I am a staff attorney with the Santa Fe Dreamers Project.
2. Out of necessity in light of the COVID-19 pandemic, I was unable to meet [REDACTED] in person. Therefore, I signed [REDACTED]'s declaration on her behalf and with her express consent.
3. I spoke with [REDACTED] via telephone and read her the entire text of the declaration on April 17, 2020. [REDACTED] confirmed that all of the information in the declaration is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



Signature

## Exhibit 7 to TRO Motion (R.H. Declaration)

**RESPONDENT'S PERSONAL DECLARATION**

I, [REDACTED] a/k/a [REDACTED], hereby state under penalty of perjury that the following statements are true and accurate to the best of my knowledge and belief:

**BIOGRAPHIC INFO & GENDER IDENTITY**

1. My name is [REDACTED]. I am a transgender woman. I was born in Honduras on [REDACTED]. My A number is [REDACTED]

**IMMIGRATION & DETENTION HISTORY**

2. I am had to leave my country because of the violence and threats against me from society and the police because of my gender and sexual orientation.
3. I am applying for asylum, withholding of removal, or protection under the Convention Against torture as I fear torture or persecution if returned to Honduras. I understand that the only way for me to remain in the United States is if I appear at all my court hearings and comply with any additional release requirements.
4. I filed an affirmative asylum application before I was detained by ICE.
5. I currently have pending charges for [REDACTED] as well as a charge for [REDACTED] [REDACTED] pending in [REDACTED]. But this the first time I have even been arrested or had any contact with police.
6. I entered ICE custody on or around January 18, 2020. I am currently scheduled for my first master calendar hearing with Judge [REDACTED] on [REDACTED] at [REDACTED] at the [REDACTED] Court.
7. I am detained at the Caroline Detention Facility.
8. If released I will go to Washington, DC to live at Casa Ruby an organization that helps LGBTQ+ youth.

**MEDICAL HISTORY**

9. I am [REDACTED] years old.
10. I do not smoke.
11. I have asthma and have had it my whole life. I have an inhaler and use it three times a day to help me breathe better.
12. I also take hormones as part of my gender affirming medical care. Upon being detained my hormones were changed, and I experienced side effects including serve headaches.

13. I was told that my hormone prescription would be changed, but I have not heard anything about this since.
14. Medical care at Caroline is sparse, but I can eventually be seen in the med unit when I submit sick call requests. It is taking longer now. I was sick last week and this week finally was able to see a doctors and get some medicine. I had a cold. In the mother Captain said we had to With the Captain when they want they call someone to the doctor.
15. I see the psychologist here sometimes for my anxiety and sometimes I can't sleep but I don't get to go a lot.
16. The medicines I take now are: Albuterol (an inhalation solution to treat asthma), Hydroxyzine Pamoate (an antihistamine to assist with sleep), Estradiol (an estrogen derivative hormone), Spironolactone (a diuretic to treat hypertension and edema), and Aspirin (to reduce pain and inflammation).
17. When I first got to Caroline I did not have an inhaler so I started feeling a tightening and itching in my chest. My room here can be really cold and that makes my chest feel like that.
18. Some of my medicines I have with me in the dorm and others are in the Medical unit.. Other we are taken in a group to get our medicine. Some of the officials use the gloves and masks, but not all of them and
19. We sent a request to ask for gloves and masks and disinfectant but

#### **COVID-19 CARE & CONDITIONS AT CAROLINE**

20. I sleep in a room of four people housed in a dorm of 35-40 people. I have experienced some harassment from the people I am detained with. I am in the male housing dorm here and there are no other transgender women that I know of.
21. A couple of weeks ago a dorm was put under quarantine and so the dorms are limited in moving around the facility. Each dorm goes by dorm to the dining hall and to the law library. The officers however are still moving between dorms and we see them wearing gloves and masks.
22. We have asked for gloves and masks, but the Officers tell us that there are not enough. They won't give us anything to protect ourselves when we move around the facility.
23. There are still new people coming into Caroline but we I don't know if they are getting tested. I heard that there are maybe 11 new people coming in. That is why we are worried because new people could bring the virus in and only the officers have masks or gloves.
24. The guards are still telling us that there are no cases of the virus here but we know that people are sick.

Because I live in a dorm with many people, it is impossible for me to keep socially distant. I am especially worried about getting sick, because I have asthma. I know the disease is bad for people who have trouble breathing. My lawyer and I tried to ask to be released because of my asthmas but they denied the request,

25. Most of the information I get about COVID-19 is from the news we watch every day. We have to watch it to get our information and that's how we know what is happening outside. The officials did give us papers about how to wash our hands and that we need to try and stay apart but it isn't helpful when they don't give us the things to go by the rules. There is no soap for us and sometimes you can buy it but not everyone can. They yell at us if we are sit too close together but we have to be together all the time.
26. Yesterday [April 16, 2020] me and other made a request together to ask for the things we need so we can follow the rules and protect ourselves. But they keep telling us there is not enough
27. I have authorized my attorney to sign for me since she cannot come visit me. I can send a signed copy if required when I am able to do so.

I, [REDACTED], state the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Ana Dionne-Lanier. I am the attorney of the declarant.
2. Out of necessity in light of the COVID-19 pandemic, I was unable to meet Mr. [REDACTED] in person. All social visits at the facility have been cancelled until further notice and legal visits are not advised. In an abundance of caution my organization has halted all legal visits to prevent the spread of COVID-19. Therefore, I signed Ms. [REDACTED]'s declaration on her behalf and with her express verbal consent.
3. I spoke with Ms. [REDACTED] via telephone and readher the entire text of the declaration on April 17, 2020. Ms. [REDACTED] confirmed that all of the information in the declaration is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



Signature

Ana Dionne-Lanier  
1612 K St. NW Suite 204  
Washington, DC 20006  
(202) 846-9589  
ana@caircoalition.org

## Exhibit 8 to TRO Motion (L.M. Declaration)

**DECLARATION OF SHAQUILLE MCINTOSH**

*I, [REDACTED], AKA [REDACTED]<sup>1</sup>, hereby state under penalty of perjury that the following statements are true and accurate to the best of my knowledge and belief:*

**IDENTITY**

1. My legal name is [REDACTED] and my A# is [REDACTED].
2. I am a transgender woman and in all my communications, my true name is [REDACTED].
3. I was born on [REDACTED] in Kingston, Jamaica.
4. In my asylum proceedings, I am represented by [REDACTED] of the Transgender Law Center. We communicate regularly by phone.
5. On [REDACTED], I entered the U.S. at the [REDACTED] port of entry to apply for asylum. I have been detained for just over two months.
6. I was first detained by CBP in San Ysidro, then transferred to San Luis, Arizona, until March 10th, when I was transferred to the Aurora ICE Processing Center in Aurora, CO, where I am currently detained.
7. I am seeking asylum in the U.S. based on the past persecution I received in Jamaica on account of being a transgender woman. [REDACTED]  
[REDACTED].
8. I am afraid that if returned to Jamaica, I will again suffer physical harm and because targeted because I am transgender and it is acceptable to beat and kill transgender women there.
9. I recently passed my credible fear interview in front of an immigration judge and I am waiting for my next hearing on [REDACTED] so that I can submit my asylum application to the court.
10. My next court hearing is at the [REDACTED] Court on [REDACTED] at [REDACTED].
11. If released, I guarantee that I will go to all of my future court hearings and any ICE appointments required.

**PERSONAL HEALTH AND ACCESS TO MEDICAL CARE**

12. I am [REDACTED] years old and a nonsmoker.

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<sup>1</sup> My legal name is [REDACTED]. I am a transgender woman and my true name that I use in all my personal interactions and communications is [REDACTED].



13. My physical health is fine.
14. I do not have any physical health conditions that I came into the U.S. with.
15. I was receiving hormone replacement therapy when I entered the U.S. and I am currently taking 2mg of estradiol, 1 testosterone blocker, and a third medication to prevent blood clots from the estradiol.
16. I was taking 8mg of estradiol prior to coming to the U.S. but the doctors are only giving me 2mg because they have to “follow their protocols.” I do not believe the 2mg dose is working.
17. For hormone replacement therapy, I used to see an endocrine doctor every three months to make sure I am safe—they draw blood to ensure that the hormones are working and that I am receiving the correct dose.
18. In Mexico, my hormones were working really well.
19. I do not feel like my hormone treatment is being done properly in detention. In San Luis, I was not given my hormones because they said they could not find my medications after I was transferred from CBP custody.
20. In Aurora, it took 3-4 weeks to see a doctor and a full month to get back on hormones, but at  $\frac{1}{4}$  of the dose I was receiving when I entered the U.S.
21. The doctors at Aurora just gave me the lowest dose of estradiol (2mg) and then when they tested my blood, they said they didn’t see any hormones in my blood so they kept me at the lowest dose.
22. Since being detained, I have developed a redness in my arms. I have asked the medical staff to look at it, but they have not given me any tests. The nurse said she does not know what it is and she was going to ask a doctor, but I have never seen a doctor for it. It looks abnormal, but it is not painful.
23. I am not on any medication for the redness in my arms and I do not know what it is. I told the nurse two weeks ago and they still have not looked at it. They do not care.
24. I do not have any mental health conditions that I came to the U.S. with.
25. Since being in the U.S., I have become depressed. The staff, especially the white officers, are racist to me. They treat black detainees and staff differently and write me up because of my attitude and it’s depressing.
26. In segregation, the officers would bring my food and leave it outside on the floor by the trash can. Sometimes the white officers won’t even come in to offer me any breakfast.
27. I have had to wait several days to receive breakfast.

28. Some of the guards misgender me, referring to me as “he” or a “man.” They say, “Young man, sit down.”
29. Lieutenant Sylvester once screamed at me, calling me a man, and said, “Not every officer is used to calling you ‘she,’” and he stood up to me like he wanted to hit me. I told him that he couldn’t hit me.
30. I don’t tell my psychologist about how depressed I am because I don’t want to be put back on suicide watch. I feel terrible. I’m sad and I cry. Sometimes I call my boyfriend and I cry and cry and cry to feel better.
31. I don’t trust the psychologist because he’s GEO staff and it will only make my situation worse if I’m honest with him about my feelings.
32. I don’t receive medication for depression, but when I was on suicide watch, they gave me medication and it made me feel really dizzy. I don’t know what that medication was.
33. I don’t think they can treat depression inside of this facility. They just give you pills, but I don’t want to take pills. If they wanted me to feel better, the staff could change how they deal with and speak to me, but we’re a long ways from that.

#### **COVID-19**

34. I don’t know much about COVID-19. I heard on the radio and on the TV that it’s causing people to die.
35. I’ve heard about social distancing also on the radio and TV—I heard we have to stay 6ft apart.
36. I get most of my information from the TV and radio, but I am talking to staff, too. One staff member told me that the virus is here but they didn’t tell me where.
37. I talk to my boyfriend on the phone and he told me that someone in Aurora tested positive for the virus. He read about it online.
38. I have not received any education or information from the staff about COVID-19.
39. There are a lot of sick people in the detention center.
40. They take the sick people to the medical pod to stay there.
41. Some of the other detainees are isolated in a medical pod. On the doors of their room, there are posters that say, “Please use safety gear when entering this room.” When the officers visit these detainees, they have to wear face masks. It is my belief that these patients have COVID-19.
42. I don’t know what kind of symptoms they have because they are in isolation and I am currently in segregation in the medical unit.

43. It's been two weeks since I was in general population.
44. I have never been tested for COVID-19 in this facility and I don't know if they're testing anyone, including staff.
45. Before I went to segregation two weeks ago, a transgender woman was separated from our dorm and transferred to another dorm by herself.
46. I heard this happened because she went to court and it turned out that one of the lawyers in court was sick so she had to be separated from everybody else.
47. I'm currently sleeping alone in medical segregation and I've been sleeping alone for two weeks.
48. Before segregation, I slept in a dorm with 12 other people. The dorm capacity sleeps 24.
49. I currently eat alone because I'm in segregation. Before segregation, I ate in groups of 2 or 3 people to a table.
50. Staff gives me bar soap for showers and for washing hands in my cell. I also have a little bottle of liquid body wash and shampoo.
51. Staff doesn't provide us with hand sanitizer or face masks, and there are no hand sanitizer stations around the facility.
52. Hand sanitizer liquid is sold in the commissary for \$3.16 according to the commissary sheet, but I don't have money to buy any.
53. Face masks aren't listed as an item available for purchase in the commissary.
54. Staff brings my laundry in every Monday.
55. My laundry is never washed properly-- I can see dirty marks and I tell staff that the clothes are dirty and smell funky, but they just reply, "they're washed."
56. All of the guards wear basic plastic gloves like you see at the doctors.
57. Some of the guards wear face masks, the paper kind that nail salon employees use.
58. Some of the staff wear cloth face masks, but not all of the staff wear face masks.
59. I'm currently in medical segregation but I'm still physically close to staff, including doctors.
60. When I take phone calls, staff stands about 3ft from me. And when I see the doctor, we sit right across from one another at a short desk.
61. Whenever I have to be escorted through the halls and into different buildings, the staff places a hand on my shoulder while we walk together.

62. I feel worried because I don't want to get the virus.
63. It is impossible to know if the staff members have the virus because they aren't getting tested and the staff are going home and returning to the facility every day so they could have the virus without having symptoms and then spread it to us inside.
64. It feels really unsafe because the nurses once took my blood pressure and they were touching my body and I had to ask them if they changed their gloves because it's unsanitary to reuse the same gloves.
65. I've seen nurses passing out medication to patients in different sections of medical without changing their gloves, so I asked them to change their gloves.
66. I ask the guards to sanitize the phone before I take a call. Sometimes they spray it with disinfectant, but not all the time.
67. I wish they would tell us the truth about the virus in the facility. I don't want to wait until the virus sweeps through the whole facility and I catch it and I die.
68. I don't feel safe in detention because the virus is here and in Colorado more generally. With officers coming in and out of the detention center, we don't know who is bringing in the virus and they wouldn't tell us about it anyway.
69. If I'm not released, I think I could get the virus and die without every telling my story and without getting asylum.
70. I don't want to die in here.

#### **ADDITIONAL INFORMATION**

71. I have experienced harassment and abuse from staff members in detention.
72. On April 3rd, staff told me that I was going to segregation because I was ignoring the detention officers.
73. One of the male lieutenants threw me to the ground, handcuffed me, and dragged me to segregation which is about the length of a normal street block.
74. They handcuffed me very tightly and it caused me a lot of pain, leaving marks on my wrist.
75. They caused bruising on my arms and neck.
76. I still have pain from the force they used against me.

77. I tied a bedsheet in my room like I was going to kill myself and they called in six men, dressed in all black, and they put their shields in my face, dragged me to the ground, pepper sprayed me, and carried me off to medical.
78. When I spoke to the psychologist, they put me on suicide watch.
79. In suicide watch, 4 men held me down and tore off my robe leaving me naked in solitary.
80. One of the heavyset men kneeled, placing his leg on top of me to restrain me while the Major threatened to tear gas me for not cooperating.
81. I still have pain from where the officer placed his leg on top of my leg.
82. Some of the white staff members come in and call me names like “male” and “man.” They won’t address me as female.
83. One guard made fun of my mother, so I made fun of her mother and she wrote me up.
84. In March, the guards moved me from the group of transgender women and put me in a cell with a cisgender man. I was so uncomfortable.
85. One staff member called me an infected person in front of another detainee. I was in the dorm and a woman came in to make me change into an orange uniform. I refused to change and she said if I came to the door, she would fight me back.
86. I told her she couldn’t fight me because she was fat and her fat was covering her heart and she said, “Well you have HIV,” loudly in front of another man and I told her that wasn’t true. It really hurt because she lied about my health in front of other people.
87. There was a woman, Molly, who was released and she told me that she was afraid of seeing the doctors because they disclosed to everyone that she had syphilis.
88. The doctors can’t be trusted with private health information.

**ABILITY TO FOLLOW SOCIAL DISTANCING GUIDELINES**

89. I sleep alone in medical segregation, but in general the dorms are suited with bunk beds.

90. There are 24 beds, including top and bottom bunks.

91. Some of the bunks in the center of the dorms are side by side, so you sleep right next to other people with a small metal divider between you.

92. If your bunk is near the wall, then you sleep only near the person on the same bunk. The beds are bolted to the ground so you can't move them.

93. During mealtime, each table can fit up to 4 people. Usually there are 2-3 people at a table. And the tables are bolted to the ground so you can't move them.

94. I've always showered by myself because I am not comfortable showering with other people.

95. In each of the showers, there are 4 or 5 stalls with a small curtain.

96. I have a sink in my cell so I can wash at will.

97. In the dorms, you have to bring your own soap to wash your hands.

98. Detainees clean the bathrooms and common areas for \$1 a day.

99. There's a cleaning schedule and the officers will bring cleaning supplies, usually disinfectant and gloves. Detainees don't get masks.

100. Sometimes the detainees don't clean that well because they aren't getting paid much.

101. The bathroom in my cell in segregation was very dirty. I saw a rat by the toilet and it was freezing cold.

102. One day in segregation, it was so cold that the officer asked her supervisor to fix the heat but Lieutenant [REDACTED] asked her if she wanted the lieutenant's jacket instead Our

noses were running because it was so cold and they didn't do anything until 11pm when they moved me to medical.

**INTERACTIONS WITH MEDICAL STAFF**

103. You can see a doctor every month or three months depending on your individual schedule.

104. I saw a doctor this past week to get my blood drawn, but before that I waited three weeks to see a doctor after arriving at Aurora.

105. My doctor doesn't wear a mask or gloves. He conducted a physical examination of my lungs, heart, and knee with his bare hands.

106. The nurses wear gloves.

107. During this physical exam, I wasn't given anything, a mask or gloves, to wear.

108. I receive my medication every morning. It's a tablet that I take orally.

109. The nurses distribute meds but they aren't changing their gloves between patients. I have to ask them to change their gloves.

110. If a detainee is showing symptoms like a fever or coughing, they get reported to the doctor and are taken out of the dorm, but I don't know where they go.

111. All of the officers in here wear gloves, but not all of them wear masks.

112. Gloves are more common than masks amongst the officers.

113. The nurses and doctors don't always wear gloves and masks.

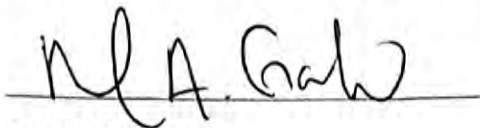
114. The guards pat me down when it's time to be escorted across the facility to medical or to another building.

115. If you are in medium or high security like I am right now, they will hold on to your shoulder while they escort you down the halls throughout the facility.

116. I don't know if the guards are washing their hands because they use separate restrooms from us.
117. I've never seen guards use hand sanitizer on themselves.
118. There are no hand sanitizer dispensers around the facility for detainees to use.
119. There is no hand sanitizer available to detainees in court.
120. The guards search and inspect my living quarters and personal belongings whenever they want and all the time.
121. When I'm in court, on a legal call, or in medical, I know the guards are searching my things because my papers and personal things are in disarray.
122. They wear gloves but no masks when they search my things.
123. On average, I get physically searched one time per day. This includes my body and my belongings. Guards wear gloves but no mask.
124. No one from staff or medical has given me any information specifically about COVID-19.
125. I've learned about COVID-19 from the radio and tv and because there are some signs on doors warning staff to wear masks and gloves before visiting patients.
126. Staff let me take a legal call for this declaration in the "trauma room." In that room, I saw a sign that said, "COVID-19 Stop the Spread of Germs." It's the first time I've been in that room and I've never seen that sign before. I believe this is an employee room.



I have authorized my attorney's representative to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.



Michael A. Galvan  
Legal Assistant  
On behalf of "[REDACTED]"

4/20/20

Date

**DECLARATION OF MICHAEL A. GALVAN**

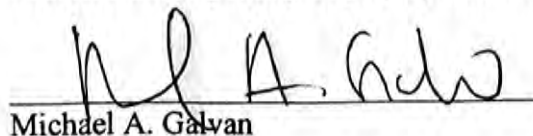
I, Michael A. Galvan, state the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

My name is Michael A. Galvan. I am a legal worker authorized to conduct legal interviews with "[REDACTED]" by her counsel, "[REDACTED]".

Out of necessity in light of the COVID-19 pandemic, I was unable to meet "[REDACTED]" in person. Immigration and Customs Enforcement has suspended in-person visitation at its facilities and limits in-person legal visits to those deemed essential. Therefore, I signed "[REDACTED]"'s declaration on her behalf and with her express consent.

I spoke with "[REDACTED]" via telephone and read her the entire text of the declaration. "[REDACTED]" confirmed that all of the information in the declaration is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



Michael A. Galvan

4/20/20

Date

## Exhibit 9 to TRO Motion (M.J.J. Declaration)

### **RESPONDENT'S PERSONAL DECLARATION**

*I, [REDACTED], a/k/a [REDACTED] hereby state under penalty of perjury that the following statements are true and accurate to the best of my knowledge and belief:*

### **BIOGRAPHIC INFO & GENDER IDENTITY**

1. My name is [REDACTED]. I am a transgender woman. I was born in Honduras on [REDACTED]. My A number is [REDACTED].

### **IMMIGRATION & DETENTION HISTORY**

2. I am applying for asylum, withholding of removal, or protection under the Convention Against Torture as I fear torture or persecution if returned to Honduras. I understand that the only way for me to remain in the United States is if I appear at all my court hearings and comply with any additional release requirements.
3. I have had a credible fear interview on [REDACTED], but have not received an answer yet, and have not been given a Court date.
4. I have been detained for about one month and a half. I was originally at El Paso, was transferred to Florence, and then to the Aurora ICE Processing Center. I have not been given any information about why I have been transferred.
5. There are only 3 or 4 guards that treat us well, but the rest are disrespectful, give us dirty looks and make us feel unwelcomed.

### **MEDICAL HISTORY**

6. I am [REDACTED] years old.
7. I do smoke.
8. I do take hormones.
9. I am not taking any other medication.
10. The doctor at El Paso told me that I am prone to syphilis and diabetes. He did not give me medication for diabetes or syphilis. He put me on a diet where sugar, pasta, and bread were restricted because these foods would increase my chance of diabetes.
11. I am taking my hormones every day, but the nurse will bring them to me at different hours each day. Sometimes she comes at 8 am, sometimes at 10 am. I know that if someone is taking a medication every day, they should be taking it at the same hour each day, so this worries me.

**COVID-19 CARE & CONDITIONS AT AURORA**

12. I was told by staff once at Aurora to wash my hands. That is the only COVID-19 information I have had from staff.
13. I know from watching television that to avoid contracting COVID-19 that I need to wash my hands often, wear gloves and masks, and avoid touching my face.
14. I saw on the news that there was someone at Aurora who has COVID-19, but the officials have denied it.
15. I stay in a dorm of seven transgender women.
16. The beds spaced out with one bed's distance between each other.
17. We aren't able to practice social distancing during the day, because there's many of us watching TV or eating together. The only time we're able to is when we sleep.
18. We often feel hungry even after eating because they don't give us enough food.
19. We are only given body soap, and no gloves or masks.
20. We have two bathrooms in our dormitories with a shower and toilet.
21. Me and the other women I stay with clean our rooms and bathroom everyday after we eat breakfast and dinner.
22. They give us disinfectant and two rags, one for the room and one for the bathroom.
23. The guards use gloves but no masks.
24. The guards come in every thirty minutes to check on us. Not all of them wear protective gear. Some wear a mask, and some only wear gloves.
25. I do not know if the guards have hand sanitizer, I have not seen any bottles of sanitizer around.
26. Our clothes are only washed every three or four days.
27. Five of the women I am detained with are HIV positive. They get their medications but the times they are given their medications vary each day.

28. We are patted down every time we leave the library, go to medical, and go to the yard. The guards only wear gloves when they do this.
29. I do not believe that anyone in my dorm has been tested for COVID-19. None of women I live with have received a test.
30. I am scared of COVID-19. Two weeks ago I had a cough and I went to medical. I was scared it could be the Virus but the medic told me it was because of the weather and only gave me aspirin. I am scared of the virus because I am detained with other women and I am scared of getting infected by them or infecting other people.
31. I have authorized Nora Gonzalez, paralegal with Santa fe Dreamers Project, to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I, Nora Gonzalez, state the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Nora Gonzalez. I am a legal assistant for the Santa Fe Dreamers Project.
2. Out of necessity in light of the COVID-19 pandemic, I was unable to meet [REDACTED] in person. The Aurora facility has suspended visitation due to the pandemic. Therefore, I signed [REDACTED]'s declaration on her behalf and with her express consent.
3. I spoke with [REDACTED] via telephone and read her the entire text of the declaration on April 17<sup>th</sup>, 2020. [REDACTED] confirmed that all of the information in the declaration is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

N. Gonzalez  
Signature

# Exhibit 10 to TRO Motion (D.B.M.U. Declaration)

### **RESPONDENT'S PERSONAL DECLARATION**

I, [REDACTED] a/k/a [REDACTED] hereby state under penalty of perjury that the following statements are true and accurate to the best of my knowledge and belief:

#### **BIOGRAPHIC INFO & GENDER IDENTITY**

1. My name is [REDACTED] [REDACTED] I am a transgender woman. I was born in Honduras on [REDACTED] My A number is [REDACTED]

#### **IMMIGRATION & DETENTION HISTORY**

2. In Honduras was punished and threatened for being transgender.
3. I am applying for asylum, withholding of removal, or protection under the Convention Against Torture, as I fear torture or persecution if returned to Honduras. I understand that the only way for me to remain in the United States is if I appear at all my court hearings and comply with any additional release requirements.
4. I had a credible fear interview on [REDACTED]. I have not received a response yet, and I do not know when I will have a Court date.
5. I have been detained for about two months. I was initially detained in El Paso. I was then transferred to Florence for a week, and then to Aurora. I am now detained at the Aurora ICE Processing Center. I have not been given a reason for why I have been transferred.
6. Here at Aurora, I have only been detained with other transgender women, so I have only had the opportunity to see how the guards interact with me and with other trans women. Some of the guards are respectful, but some of them treat us harshly and I feel that they look at us like we don't exist. Some of the guards do things like turn off the television while we are watching it, and yell at us harshly when they need to speak to us.

#### **MEDICAL HISTORY**

7. I am [REDACTED] years old.
8. I do not smoke.
9. I take hormones, but no other medications.
10. I was told by the doctor here at Aurora that I am supposed to receive my hormones at the same time of day, every day. However, the staff who give me my hormone pills bring them at very different times: sometimes 8 a.m., sometimes 11 a.m.
11. About every three days, I am taken to the doctor for a medical checkup, and they take my temperature.

## **COVID-19 CARE & CONDITIONS AT AURORA**

12. I have not received any information or education about COVID-19 from any officials at Aurora.
13. The only information I have received about COVID-19 came from watching the news.
14. We heard on the news that there was a case here in the Aurora detention center. The guards are saying that it is not true. But we are worried because we have heard that it kills people.
15. I understand that COVID-19 can cause fever, dizziness, breathing difficulties.
16. I have not seen anyone at Aurora being tested for COVID-19.
17. I am detained in a room with one other transgender woman. Until April 15<sup>th</sup>, I was detained in a room with six other transgender women. The beds were attached to the floor, so we could not move them apart. This meant we had to sleep about five feet from each other. Now that there are fewer of us, we are able to sleep farther apart.
18. I do not have access to any hand sanitizer, gloves, or masks. I have not asked for these things because the guards don't use them, and so I have assumed that it would be impossible for me to get them.
19. Our clothes are washed, but not as often as is wanted or needed. We each have two uniforms, and we are allowed to wash them every three days. If our clothes get dirty before the day to wash, we just have to wear the dirty clothes.
20. The other detainee and I do all the cleaning of our cell and bathroom. We have a broom to sweep the floor with, and we have rags and disinfectant for cleaning the tables and the bathroom. We do the cleaning three times a day.
21. The bathroom sink has been clogged for a long time, and we cannot fix it because we don't have the tools. We have a container that we have to use to bring the dirty water to the shower to dump it out. We have told the guards repeatedly about the problem with the sink, but nothing has been done about it.
22. When medication is delivered the medical staff wear gloves but do not wear masks. The guards also do not wear masks or gloves.
23. I have never seen any of the guards wash their hands or use hand sanitizer.
24. When I was first transferred here to Aurora, I was patted down, by a guard who was wearing gloves that time, but no mask.



25. I am afraid. I do not want to get sick and die.

26. I have authorized Maddie Thomson, attorney, and legal volunteer with Santa Fe Dreamers project, to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I, Maddie Thomson, state the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Maddie Thomson. I am a legal volunteer with Santa Fe Dreamers Project.
2. Out of necessity in light of the COVID-19 pandemic, I was unable to meet [REDACTED] [REDACTED] a/k/a [REDACTED] in person. Therefore, I signed [REDACTED] [REDACTED] a/k/a [REDACTED] s declaration on her behalf and with her express consent.
3. I spoke with [REDACTED] a/k/a [REDACTED] via telephone and read her the entire text of the declaration on April 16, 2020. [REDACTED] [REDACTED] a/k/a [REDACTED] confirmed that all of the information in the declaration is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Signature

# Exhibit 11 to TRO Motion (K.R.H. Declaration)

I, [REDACTED] declare as follows:

1. My legal name is [REDACTED]. My true name is [REDACTED]. I was born on [REDACTED] and am a citizen of Guatemala. My alien number is [REDACTED].
2. I identify as transgender. I am seeking asylum because I have been persecuted for my LGBTQ+ identity. I have been threatened, and I survived a kidnapping attempt.
3. I am currently detained in La Palma Correctional Center in Arizona. I have been detained at La Palma since April 2019.
4. I have an appeal pending before the Board of Immigration Appeals. I am represented in my immigration case by [REDACTED] who is my pro bono counsel on appeal. I communicate with him mostly by mail.
5. ICE originally set my bond at \$ [REDACTED], but the immigration judge reduced it to \$ [REDACTED].
6. If I am released, I would stay with a friend named [REDACTED], who is a United States citizen and lives in Stamford, Connecticut. I also have friends who live in Phoenix. I would promise to go to all of my hearings and continue to seek asylum.
7. I have no prior criminal history.
8. I am worried that I could get the COVID-19 virus because of the staff's lack of preparation and safety measures. I know that the virus is very contagious and that everyone is exposed to it here.
9. The staff has only mentioned the virus one time. The case manager talked to us three weeks ago and told us to wash our hands and practice social distancing. The CoreCivic staff gave us a form to sign in exchange for a mask, but the form would release CoreCivic from liability if we got sick, and I did not sign it. Even though almost nobody signed the form, they passed out masks one and a half weeks ago, but the masks are supposed to be good for only two hours. The staff had one detainee translate the information into Spanish. They also put up some posters around the facility with information about COVID-19 in various languages, including Spanish. We are now brought food so that we do not go to the cafeteria, but everyone is together at a table or watching television in groups of 20 or 30 people.
10. My pod, which is called [REDACTED], is next to [REDACTED] where the medical staff brings those who are exhibiting symptoms and need supervision. Those detainees, and all new detainees, use the same entrance that we do.
11. The guards do not generally use masks or gloves. For visitations, they wear gloves, but use the same pair of gloves to pat everyone down. They also inspect our cells once a month and wear the same gloves to inspect everything.

12. Two and a half weeks ago, I had flu-like or COVID-19-like symptoms. My head hurt, and I had a fever. I did not send a specific medical request because it can take two to three weeks to be seen, but I put these symptoms in the same medical request I made about a heart condition I have called tachycardia. I saw the nurse one week later. Despite my symptoms, the nurse told me that I was fine and did not give me any medicine, even pills for my headache. She also did not schedule me for a follow-up appointment. She did not give me a test for COVID-19, and I don't know if anyone has been tested. I was not given a mask or gloves for my examination. The nurse had gloves, but not a mask. Nothing was done to stop the spread if I was contagious.

13. I learned that three people were infected with the virus last week and were brought from a different pod to [REDACTED] for medical supervision. The facility does not tell us about patients, but other detainees who work in the medical area tell us.

14. We are not able to keep our distance from other detainees. There are 120 people in a pod, with 2 in each cell. There is no space in the cells to stay 6 feet away from each other. The beds and chairs are very close to each other, with generally half a meter or less between them. We have to clean our own cells, and also the public spaces, using the same single mask that they recently gave us. We have no materials to make any other mask or protection.

15. We do not have any soap or hand sanitizer. We only receive shampoo, which we have to use to wash our hands too.

16. As I mentioned, I suffer from tachycardia and have since I was 20, when I had an attack that was almost a cardiac arrest. I had been taking medicine for it, and I got better, but until recently, I could not get medicine in detention. I had an attack recently. I felt my heart racing during the night, and during the day I had shortness of breath and nausea. I made a medical request, but one week passed before I saw the nurse. Despite my other COVID-19-like symptoms, the nurse said that I was okay and did not give me any medicine or make a follow-up appointment. When a doctor called me two weeks later for my one-year check-up (since being detained), the doctor gave me medicine for tachycardia. My tachycardia has returned in detention and is stronger than it was in the past.

17. I also suffer from anxiety, which has gotten worse in detention. The medical staff observed that my weight has gone up and down, by as much as 30 pounds in one month.

18. I do not feel safe at all in detention. Besides fear of the virus, I have been shouted at in the dining room and called a "marica" by other detainees, and other detainees have insulted and laughed at me. All of us trans women, including me, have asked for a change of detention center. Three other trans women agreed to be segregated, but after they were put in segregation at Eloy Detention Center for 8 days, they were brought back to La Palma Correctional Center and remain together with the rest of us.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on:

April 21, 2020

Date

A handwritten signature in black ink, appearing to read "Jeffrey B Molinar", written over a horizontal line.

Signed by Jeffrey B Molinar on behalf of

[REDACTED]  
with her oral authorization and permission.

# Exhibit 12 to TRO Motion (G.P. Declaration)

**RESPONDENT'S PERSONAL DECLARATION**

I, [REDACTED], a/k/a [REDACTED], hereby state under penalty of perjury that the following statements are true and accurate to the best of my knowledge and belief:

**BIOGRAPHIC INFO & GENDER IDENTITY**

1. My name is [REDACTED]. I am a transgender woman. I was born in Honduras on [REDACTED]. My A number is [REDACTED].

**IMMIGRATION & DETENTION HISTORY**

2. I in Honduras I experienced persecution due to my transgender status and fled. I am applying for asylum, withholding of removal, or protection under the Convention Against Torture as I fear torture or persecution if returned to Honduras. I understand that the only way for me to remain in the United States is if I appear at all my court hearings and comply with any additional release requirements.
3. I have been detained for 15 months, all at Imperial Regional Detention Facility.
4. I have a sponsor who will take me in if I am released.
5. I have not experienced any discrimination or abuse from the guards for being transgender?

**MEDICAL HISTORY**

6. I am [REDACTED] years old.
7. I do not smoke.
8. While detained I have sometimes had a cold or flu, but I'm not having any symptoms now besides headaches for approximately four days.
9. I have received pain medication to treat my headaches. I have undergone testing in the medical unit to see if I am able to receive hormone treatment, but as of now am not taking hormones. I am not taking any other medication.
10. As of now, I have not been diagnosed with any conditions or illness. I am waiting to hear back about my test results from the doctor.
11. When I receive medicine like pain medication from the nurse, she wears gloves and a mask. I am currently in solitary because, while living in the dormitory, I developed a romantic relationship with a boy I met there. When the guards found out, they separated us and put me in solitary for a month as punishment because it is not permitted to have partners in the same dormitory while in detention. While in solitary, if I have a medical issue there is a button I can press in my cell if there is an emergency or I can submit a

request to be visited by the nurse the next day.

### **COVID-19 CARE & CONDITIONS AT IMPERIAL**

12. The guards or some civil workers did a “charla”/informal presentation in the dormitory about COVID-19, and they told us about keeping distance, and told us that we should only eat 4 to a table, and wash our hands. The presentation was given in Spanish.
13. There have been a couple presentations, and they gave us papers with some information about how the virus is spread.
14. I do not know if anyone at Imperial has contracted COVID-19. They did an examination of all 64 people in our dorm. I do not believe that anyone was tested for COVID-19, we were told that if someone has a cough they will be isolated for 14 days.
15. Officials say we are all being “quarantined” because they limited activities where people would be together. They used to do English classes, but they stopped doing that. Officials stopped letting us use the library, and they limited the number of people who can be in the yard. Staff are still doing haircuts, but only one at a time. The last time I saw the staff giving haircuts, they were not wearing masks or gloves. Otherwise, the guards, the nurses, and the people working in the kitchen have protective equipment like gloves and masks.
16. There is a separate dorm for people who work in the kitchen or as cleaners.
17. There are 64 people in our dorm. We are on two levels and there are rooms of four people for sleeping. The bunk beds are two arm lengths apart. We eat together in small groups. We still line up to get food the same as we did before, with the same distance between us in line as we did before. Social distancing is not possible.
18. Out of the 64 people in our dorm, there are two transgender woman, including myself. The other 62 people are cisgender men. I have not experienced any harassment or abuse from those men.
19. Liquid soap is available, the kind you press a button for. On each floor, four sinks per grouping of 32 people, and there is one soap dispenser upstairs, with 2 soap dispensers downstairs. At first for several weeks we did not have access to masks, gloves, or hand sanitizer. However, a few days ago most of us in the dormitory received masks. We still do not have access to gloves or hand sanitizer.
20. The only people with both masks and gloves are those who work in the kitchen or clean. The guards wear gloves when they are searching people like they normally do. At first, the guards did not use masks but, as of a few days ago, I think that the detention center has become more organized because the guards now also wear masks.



21. The dormitory and bathrooms, including the tables, mirrors, sinks, and floors, are cleaned three times every day by other people who are detained at Imperial and who use masks and gloves while cleaning. They use a blue chemical that I think is a disinfectant.
22. Our personal space is checked about once a month and they usually let you know it will be inspected beforehand. In the fifteen months I have been detained, they have done checks of everyone in the dormitory at the same time four separate times. They do wear masks and gloves while doing these checks.
23. The guards usually do pat-downs when we are moving from place to place in the detention center, like when we leave the library or go outside to the yard. They use gloves and masks while doing the pat-downs.
24. I do not always feel safe, I do not know what is going to happen in here. It feels very uncertain. There are still new people coming in. Most visits have stopped, except for the legal visits.
25. I have authorized Grace Laria, paralegal with the Santa Fe Dreamers Project, to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I, Grace Laria, state the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Grace Laria. I am a legal assistant with the Santa Fe Dreamers Project.
2. Out of necessity in light of the COVID-19 pandemic, I was unable to meet [REDACTED] in person. Therefore, I signed [REDACTED]'s declaration on her behalf and with her express consent.
3. I spoke with [REDACTED] via telephone and read her the entire text of the declaration on April 17, 2020. [REDACTED] confirmed that all of the information in the declaration is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



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Signature

# Exhibit 13 to TRO Motion (M.R.P. Declaration)

### **RESPONDENT'S PERSONAL DECLARATION**

I, [REDACTED], a/k/a [REDACTED], hereby state under penalty of perjury that the following statements are true and accurate to the best of my knowledge and belief:

### **BIOGRAPHIC INFO & GENDER IDENTITY**

1. My name is [REDACTED]. I am a transgender woman. I was born in El Salvador on [REDACTED]. My A number is [REDACTED].

### **IMMIGRATION & DETENTION HISTORY**

2. I fled El Salvador due to persecution, physical abuse, discrimination, and death threats due of my transgender identity and perceived sexual orientation.
3. I am applying for asylum, withholding of removal, or protection under the Convention Against Torture as I fear torture or persecution if returned to El Salvador. I understand that the only way for me to remain in the United States is if I appear at all my court hearings and comply with any additional release requirements.
4. I have a master hearing scheduled on [REDACTED] at [REDACTED] with Judge [REDACTED]n at the [REDACTED] Court.
5. I was detained on June 11, 2019. I spent 40 days in the hielera before being transferred to Cibola On July 21, 2019. I was transferred to Otero, and in February 2020 I was transferred to El Paso. I am currently detained at the El Paso Processing Center.
6. I have sponsors who will take me if I am released.
7. While detained at Otero, I experienced discriminaton and verbal abuse due to my identity as a transgender woman. I communicated this to my lawyer. There was an official at Otero whose name was Montenegro who told me he would place me in solitary because I was "walking like a woman" through the hallways and that I needed to behave myself. He said that if I responded to him with a "lack of respect" he would tell the judge, which would negatively affect my immigration case.

### **MEDICAL HISTORY**

8. I am [REDACTED] years old.
9. I do not smoke.
10. I often feel depressed, stressed, and anxious and often have migraines as a result of head injuries I sustained in El Salvador while being tortured due to my gender identity.

11. I have respiratory issues. I often feel like I can't breath, especially at night when I'm sleeping. I've had these issues since I was living in El Salvador but was never able to go to a doctor to get a check-up. I'm not sure why I have these issues, but I think they might be related to my depression. I've gone to the doctor in detention and am currently on a special diet to address my respiratory issues because the doctors linked these problems with obesity.
12. It feels like my heartbeat is too fast; when I sleep I have convulsions.
13. I often have nausea.
14. I have blood when I wipe after using the bathroom, and the medical unit initially diagnosed me with hemorrhoids and prescribed me medication. However, the symptoms continued and another doctor examined me and said that I actually did not have hemorrhoids. I still continue to find blood when I wipe after using the bathroom. It remains an undiagnosed issue.
15. My medical records indicate that I have symptoms of hypothyroidism, a diagnosis of Hepatitis A, abnormally high bilirubin, and abnormally high hemoglobin.
16. All my family has diabetes and while I do not have a formal diagnosis I know I am at risk of getting diabetes.
17. When I was at Otero I was taking ibuprofen, anxiety medication, allergy medication, and ear medication for an infection. Since being transferred to El Paso I only receive gender affirming hormones and my medical conditions are not being treated.
18. I have asked for medications, but I have not gotten anything.
19. To my knowledge, no one in detention whom I know is receiving medication.
20. Although no one I know in detention is receiving medication, I have seen medical staff wearing gloves and masks.

### **COVID-19 CARE & CONDITIONS AT EL PASO**

21. I understand that people with COVID-19 are isolated because it can be contagious to others. I have to wash my hands with soap or shampoo when I touch objects. I must distance myself from other people. However, it is difficult to maintain distance between myself and others because we live in such close-quarters.

22. New arrivals at El Paso are quarantined in a different barrack for 14 days; they are wearing masks.
23. I learned about COVID-19 from ICE notices on the walls in the dorms giving preventative advice. Also I learned from watching the news that we should be using hand sanitizer but we do not have that in detention.
24. The only COVID-19 information I have received from staff is from the flyers which are in English, Spanish, and other languages. However, the way that I have principally learned about coronavirus is through the news and not through the detention center staff.
25. I don't know that anyone here has COVID-19, but I doubt that they would tell us if there was someone with COVID-19 because they don't want us to worry. In the news on Telemundo I saw that other detainees are complaining.
26. I do not know who is being tested at El Paso. Sick people are just isolated and put under medical observation.
27. I sleep in a barrack with 9 cisgender men. I am afraid to sleep in my barrack because I am afraid that they will abuse me.
28. We eat together in a dining hall, but at different times from the people in medical isolation.
29. I know that the detention center staff cleans the dining hall because I see them cleaning the room with disinfectant while we're eating.
30. We have soap, but no masks, gloves, or hand sanitizer. There is no commissary to purchase protective equipment, just vending machines selling junk food.
31. The guards wear gloves and face masks.
32. We can wash our white clothes every day, but our blue uniforms are only washed twice a week.
33. We clean our barracks, specifically the sinks, phones, and tables, once every day with disinfectant.
34. The beds in the barrack are only three to four feet apart, so social distancing is impossible.
35. The guards do not inspect our personal property.
36. The guards pat us down daily while wearing gloves and masks.

37. There are five sinks available for the 20 people in our barracks that are only cleaned once a day only. They are also not cleaning the bathrooms enough, only once a day. We cannot disinfect on our own because we are not given the necessary chemicals to do it ourselves.
38. I am fearful that I may get infected with the virus. I am afraid that it would exacerbate my medical issues. I know that people with diabetes and respiratory issues are at a heightened risk of complications. I have also been experiencing respiratory issues since I was in El Salvador, for about five years, and understand that I am at higher risk for serious medical issues if I contract COVID-19.
39. I have authorized Grace Laria, paralegal with the Santa Fe Dreamers Project, to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I, Grace Laria, state the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Grace Laria. I am a legal assistant for the Santa Fe Dreamers Project.
2. Out of necessity in light of the COVID-19 pandemic, I was unable to meet [REDACTED] [REDACTED] in person. Therefore, I signed [REDACTED]'s declaration on her behalf and with her express consent.
3. I spoke with [REDACTED] via telephone and read her the entire text of the declaration on April 16, 2020. [REDACTED] confirmed that all of the information in the declaration is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



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Signature