

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

Ángel Alejandro Heredia Mons et al.)	
)	
Plaintiffs,)	
v.)	Civ. No.: 1:19-cv-01593
)	
Kevin K. McALEENAN et al.)	
)	
Defendants/Respondents.)	
)	

DECLARATION OF D.A.A.

I, D.A.A., declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am a Cameroonian asylum-seeker detained at the LaSalle ICE Processing Center (“LaSalle”) in Jena, Louisiana. I am a native English speaker. I am twenty-seven years old. I have suffered many injuries on my body from the persecution I endured in Cameroon, including chest problems due to severe torture. Currently, I have severe pain in my left testicle due to a cyst. I have been detained under the custody of ICE for seven months.

Synopsis of Past Persecution

2. In Cameroon, I worked as an activist with a human rights organization. I investigated human rights abuses in my community and reported them to my organization, which published the abuses. Because of this work, I was targeted by the military. I was detained and brutally tortured by the military of Cameroon on several occasions and was labeled as a spy.
3. I was also persecuted by a separatist group in my community because I advocated that children return to school. The separatist group had stopped children from attending

school for the last four years, but I viewed this as a human rights violation. We had radio programs encouraging parents to send their children to school and worked with the U.S. embassy to get school supplies. The separatist group threatened to kill me because of this. Due to this persecution, I fled Cameroon with the help of my family and the organization I worked for, Human is Right.

Journey to the United States

4. I left Cameroon with the assistance of a female police officer, who helped me pass through security at the airport. I flew to Turkey, then through Panama, and then Ecuador. I found it difficult to stay in Ecuador because of the language barrier and racial discrimination. I found a group to transit with to Colombia. We traveled through the Darien Gap. This was one of the toughest times in my life. I saw people die in front of me, but luckily, I was able to make it out. I traveled through Panama, Costa Rica, Honduras, Guatemala and Mexico.
5. I tried to apply for asylum in Mexico but was denied, so I needed to make it to the United States (US). I made it to Nuevo Laredo, but things are rough there. My money and my bag were stolen. Eventually, I took a bus to the port of entry. There I was forced to wait before I was processed by US border authorities.

Time in ICE Custody and Impediments to Parole Access

6. At the port of entry, I had a brief interview with CBP around October 3, 2019. After being processed at the border, I was kept in the “cold house” for approximately seven days before being transferred to the Rio Grande Detention Center. There, I had a medical screening and only stayed for one night. Next, I was transferred to Tallahatchie County Correctional Facility (“Tallahatchie”).

7. In Tallahatchie I got another medical screening. I mentioned I was having problems with my eyesight and could barely see, a condition I developed while detained in Cameroon. I also had my credible fear interview while detained in Tallahatchie and was given a positive credibility finding. In October 2019, an ICE officer told me that no one in Tallahatchie gets parole and I'll have to ask for a redetermination when I get transferred to another facility. The ICE officer just served me the notification that my parole was denied. I didn't even have the chance to submit any supporting documentation.
8. After approximately two months in Tallahatchie, I was transferred to the River Correctional Facility (“River”). I had a medical screening when I got to River and was finally given eye drops to help with my eyesight. While detained at River, I developed pain in my left testicle. A nurse examined me and discovered I had a growth; she said I needed an ultrasound. However, it was weeks before a doctor was able to examine me and approve an ultrasound. Before I was able to get the ultrasound, I was transferred to the LaSalle ICE Processing Center (“LaSalle”) in Jena, Louisiana. This was sometime in or about January 2020.
9. When I got to LaSalle, I put in a sick call about the pain in my testicle. It took about three weeks for another ultrasound to get approved, even though it had already been approved while I was at River. I was taken to a hospital outside of the detention center to get the ultrasound. Two weeks later I was told the findings of the ultrasound, which indicated I have a cyst in my left testicle. This is why I have a sharp pain. I was given Ibuprofen for the pain. However, I've been taking it for a month and my body has adjusted to it and it no longer helps with the pain.

10. Before I had my final hearing with Immigration Judge Landis, I wrote a letter asking to postpone my hearing because I was in severe pain from the cyst and was worried about doing my hearing while I was in so much pain. However, he ignored my letter, and when I asked during the hearing, he denied my request. He also denied my request for more time to find an attorney, so I proceeded without one.

11. The judge denied my case because he said he did not believe me, as there were inconsistencies between my credible fear interview and my testimony. But the judge only asked me yes or no questions during the hearing, so I could not properly explain my story. He also ignored the evidence I presented, including affidavits and country conditions reports. I appealed this decision on April 7, 2020, and it remains pending.

12. In the month of February 2020, my dorm H-B was under quarantine for approximately one month because of the flu. Lots of people were coughing and many people were taken to the medical unit. No one was allowed to leave the dorm and we only had recreational time with people in our unit. Eventually this quarantine was lifted about 6 weeks ago.

13. After my first parole denial in Tallahatchie, I applied again while detained at the River Correctional Center on or about November 27, 2019. I included documentation from my sponsor including a letter of support, identification and his tax returns. A week later, I had a brief interview with ICE and they asked questions about whether I had a sponsor (I stated I did), if I had money in my account (I stated I did), what mode of transport I would use get to my sponsor (I stated by bus), if I had money to pay for a bus ticket (I stated I did), and if I had community ties (I explained that I am Catholic and would attend my aunt and uncle's church as they're Catholic too). The ICE officer said they will get back to me. However, I never got a response.

14. After about a month without any response, I made a request on a sheet of paper to ICE asking about the decision on my parole. ICE wrote back on the same sheet that my parole was denied, but there was no explanation as to why. I didn't receive any other documentation indicating why my parole was denied. I was transferred from River Correctional Center on or around January 27, 2020, to LaSalle ICE Processing Center in Jena, Louisiana.

15. I applied for parole again sometime in February 2020. Since then I have not received any reply or decision. I wrote to ICE on the tablet in my dorm asking why I hadn't yet received a reply and was told that my ICE deportation officer is in River, so I would need to write to him to find out what was going on with my parole application. However, I don't know my deportation officer's name and was never given any contact information for him. As such, it was impossible for me to contact him. That is the only response I've gotten from anyone here in Jena.

16. There are about 86 people in my dorm. Our beds are very close to each other, just a few millimeters apart. We have a total of six toilets, but only three of them are currently working. We have seven showers for all 86 of us, all of them have some water flow, but only four showers work properly. For the other three, the water pressure is too weak and doesn't last long enough to be able to take a shower. When I first arrived at LaSalle there was hand soap on the wall. A few weeks ago, this started to run out in the middle of the day. Now, they gave each person an individual bottle of universal soap to be used for hand washing, bathing and shampoo. We get a new bottle every Monday, so we have to make the bottle last the whole week.

17. Starting last Wednesday, April 22nd, everyone was given masks, but not everyone wears them. The other detainees don't think it matters if we wear them because everyone is mixed with each other and think we've already been exposed, so most people don't wear them. We get gloves only when we want to clean the dorm. The officers have access to masks, but they also don't always wear them. They're supposed to wear masks when they enter our dorms, but most officials don't respect the rules. As for gloves, sometimes the officers wear them and sometimes they don't. They're not consistent about wearing gloves but they are touching a lot of communal things such as the phones to make sure they're working, or the television remote.

18. More and more people are developing symptoms, like cough, sneezing, and fever. Our dorm is under quarantine; three out of the four dorms in my unit, Hawk, are quarantined. The officers have been short-staffed. There are two officers taking care of four dorms in one unit. Normally we have four officers for one unit; one officer per dorm. I also see completely new faces. They also don't sit inside the dorms like they used to, they sit outside in the hallway and look through the glass. Normally an officer sits in the dorm at their station the whole day.

19. Last week on April 22nd, there was unrest because of fears about COVID-19 and being quarantined. They don't give us a straight answer about why we are being quarantined. The facility administrator came to our dorm and told us that there were no cases of COVID-19 in LaSalle. He said they were just taking precautions and that people are developing the flu because of the change in weather.

Plans if Released on Parole

20. If I am released on parole, I will live with my US citizen uncle in Frederick, Maryland.

My uncle will provide ongoing housing for me, financial support and support for my immigration case. My US citizen cousin has also offered to provide me whatever support I need upon my release. My family in Maryland is very supportive of me. I have already secured representation for my appeal to the Board of Immigration Appeals. I plan to self-quarantine in my uncle's home to keep myself and others safe from COVID-19.

DECLARATION OF D.A.A.

I, [REDACTED], am the individual referred to as D.A.A. in the attached declaration. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

I have authorized a legal agent for Plaintiffs in the *Heredia Mons* litigation to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. I am also foregoing the option to sign documents sent by mail due to the urgency of the COVID-19 situation and due to reasonable fear of destruction of mail or retaliation by officials at this facility. If required to do so, I will provide a signature when I am able.



Michelle P. Gonzalez, Esq.
On behalf of class member [REDACTED]

Date: April 30, 2020