

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

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

DECLARATION OF Y.M.T.

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

Biographical Information

1. I was born in Cameroon. I am a 26-year-old asylum seeker detained at the Pine Prairie ICE Processing Center (Pine Prairie) in Louisiana. I am a native Bayangi speaker. I also speak English fluently.
2. I was forced to flee Cameroon after facing political persecution by the military. My village in Cameroon was supporting the separatist movement, and the military came and attacked me with a knife and left me unconscious. My family and I were forced to flee. My family is on the run and they told me that since I fled the military continues to search for me in order to kill me.
3. I flew on a plane to South America. From Ecuador, I took a bus to Colombia, and I had to walk through the jungle for about four days to get to Panama. I was apprehended by immigration authorities in Panama, and they passed me to immigration authorities in Costa

Rica. In Costa Rica, I was released and continued north through Nicaragua, Honduras, Guatemala, and Mexico.

4. I arrived at the border at Mexicali, Mexico at the end of June 2019. I was provided a number, and I was told I would have to wait a week for my number to be called. I waited for two and a half months before my number was called. On my birthday, September 15, 2019, my number was called, and I was able to present myself to United States (US) immigration officials at the Calexico port of entry in California.

Impediments to Parole Access

5. At the port of entry, I was initially detained at a local detention center at the border before being transferred to Tallahatchie County Correctional Facility (Tallahatchie) in Tutwiler, Mississippi.
6. At Tallahatchie, I was administered a credible fear interview (CFI), and shortly thereafter I received a positive CFI determination. A few days later, I was given some documents alerting me that I could apply for parole but that I would need to submit documents in about four or five days. I had not been able to get in touch with my sponsor yet, and with such a short time frame, I was unable to submit any documents. I was not provided a parole interview. A couple days later, I received a parole denial letter, dated November 1, 2019. Many boxes were checked. I was frustrated, because they were judging my eligibility without having seen any of my evidence.
7. In mid-November 2019, I was transferred to Pine Prairie. A couple of weeks later, I was finally able to reach my US Citizen sponsor who is the brother of my brother-in-law. I submitted my first parole redetermination request in early December by handing the request directly to an ICE agent. This request included my sponsor's letter of support,

proof of his address, his tax documents, and a copy of his passport. ICE already had in its possession my Cameroonian driver's license, but I also submitted a copy.

8. I did not receive any response, parole advisal, or parole interview, so after about two weeks, I again gave my documents directly to an ICE agent at Pine Prairie.
9. I continued to wait in silence. I resent my parole request every couple of weeks via different methods: hand-delivery to ICE agents, dropping it in the ICE mailbox at Pine Prairie, and mailing my documents via postal service to my Deportation Officer (DO), whose name is Moffet. Without so much as an opportunity to speak to my DO, I waited until March 26, 2020, at which time I received a parole denial letter from a private guard at Pine Prairie.
10. The letter stated that I had been provided an interview on December 10, 2020, and it also deemed me a flight risk and alleged that I lack substantial ties to the community. I was heartbroken by the denial and frustrated to read that ICE alleged I had received a parole interview, which was untrue. I was talking to a friend in my bunk who had received a letter at the same time. His letter also alleged that he had been provided an interview on December 10, 2020. He told me that he too had never received an interview. ICE provided no further indication or explanation about why I was deemed a flight risk, so I am unsure how I can prove to them that I am not.
11. I decided to resubmit a request for parole with additional letters of support from friends in the US They attested to my good moral character and stated that they would help support me upon my release. I also included my medical records from Pine Prairie that show I have latent Tuberculosis. Around April 23, 2020, I handed my new parole request to an ICE agent and I mailed one copy of my request to DO Moffet and another copy to

the Interim New Orleans ICE Field Office Director, Diane Witte. I have not received any receipt of my new application or a response of any kind.

12. Several weeks ago, I and other Cameroonians here who are all eligible for parole, decided to start a hunger strike to protest the injustice of the blanket denials of parole. We continued the hunger strike for days, but ICE never provided us any information about parole or gave us the opportunity to receive parole interviews. About a week into the protest, we were all taken to solitary confinement, and put in cells of two people each. We were forced to stay there until we ate food. We still did not receive any information about parole. A couple days later, I ate some food and was released, but some others remained in solitary confinement for another week. We are frequently threatened with solitary confinement here. I feel so hopeless. I feel like I have no rights because I am an immigrant.

Fear of Continued Detention and Plans if Released on Parole

13. We are all very scared about contracting coronavirus. My dorm is currently under quarantine while we wait for the test results to come back for one suspected case in my dorm. We are being held without access to release and our own health and safety is out of our control. I am especially worried because of my medical condition, latent Tuberculosis. Even before coronavirus, I was scared for my health. A doctor told me that if left untreated, this disease could have long-term negative effects on my health.
14. I am eager to be released on parole to the care of my US citizen sponsor so that I can self-quarantine and get the medical care I need. My sponsor's wife is a nurse, and she will help make sure that I get the medical care I need.

15. Just today, I was given a notice that my asylum hearing was moved to May 5, 2020. This gives me less than a week's notice to prepare for court, which I expect to face alone since I have been unable to retain an attorney to take my immigration case. All I can do is keep fighting my case and continue requesting parole.

VERIFICATION

I, [REDACTED], am the individual referred to as Y.M.T. in the attached declaration. I declare under penalty of perjury 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.



Jaclyn Cole
On behalf of witness [REDACTED]

Date: April 29, 2020