

DECLARATION OF ANGEL PORTUONDO

I, Angel PORTUONDO, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have stated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 54 years old, and I am from Cuba.

3. I am currently detained at the KROME SERVICE PROCESSING CENTER in Miami, Florida. I have been detained here since July 5th, 2019.

4. I am seeking readjustment of status with a waiver pursuant to the Cuban Adjustment Act [hereinafter, "CAA"], Asylum, Withholding of Removal, and protection under the Convention Against Torture, in the alternative, based on my sexual orientation due to persecution I fear in Cuba as a homosexual man. I am married to a United States citizen and have been since May 5th, 2016.

5. I have been diagnosed with prostate cancer and require specialized treatment. My cancer leaves me susceptible to complications if I were to be exposed to COVID-19. The virus is known to attack the immune system and mine is weakened by my cancer. I fear the virus would be fatal for me due to my already weakened health.

6. I have had many different cellmates since I arrived at the Krome Service Processing Center. I have also been transported in and out of the Krome Service Processing Center to the hospital and medical visits since the outbreak of COVID-19; having had more contact with various potentially infected individuals during the processing and transportation process.

7. I am currently in one of the dorms at the Krome Service Processing

Center that is under quarantine.

8. On April 1, 2020, I was taken by two (2) guards from the KROME SERVICE PROCESSING CENTER in a mini-van to Larkin Hospital for a nuclear medicine test.

9. While leaving Larkin Hospital, I saw another officer from KROME at the hospital who was watching another KROME detainee at the hospital, who was under observation for COVID-19 because he had a high temperature.

10. On April 7th, 2020, there was a protest in my pod, so they took five (5) or six (6) people out of our pod.

11. However, I am currently detained with fifty-eight (58) other people in a pod. We share a bathroom with five (5) toilets and nine (9) showers and everything else within the room. The toilets and showers are less than six (6) feet apart.

12. The pods are small and the bunk beds have the mattresses close to one another. I sleep on the bottom bunk and another detainee sleeps on the top bunk. It is not possible to stay six (6) feet away from cellmates.

13. Four (4) days ago, new people come from a county jail into my pod. When new detained men were placed into my room, they were put there without having been tested to confirm they do not have COVID-19. Most of them said that they had not been quarantined.

14. I am very concerned because at least one (1) detainee has tested positive for COVID-19 after he was transported from KROME to and from the hospital. The two (2) guards watching him subsequently also tested positive for COVID-19.

15. I have recently been taken on a hospital visit and although I am being told that I do not have COVID-19, I am constantly worried and constantly being placed at risk on every visit to an outside doctor and/or hospital and because of my

medical condition and my cancer diagnosis future hospital and doctor visits are inevitable.

16. Further, the detention center is set up so that detainees are close to each other when we eat. We eat together in close quarters. There is no separation. The tables area forces us to eat right next to each other. Neither the tables nor chairs can be moved.

17. In general, the pods are crowded, making it not possible to maintain six (6) feet of distance from other people. More people keep coming into the detention center.

18. As of a couple of days ago, I was placed into what they are calling a quarantine pod. I can only assume that the reason I was placed in this pod is because I have been outside of the facility to a doctor's visit. ICE moved all of the people that have had contact with the outside or anyone else that is at risk for COVID-19 into a single pod. We also use the same showers, which are not regularly cleaned.

19. As of last night, April 7, 2020, they took away our TVs, the phones, and the tablets because they don't want us to know what is going on. No unit in the camp is allowed to watch TV at all.

20. We do not have hand sanitizer available in the common area. We see the guards have one (1) hand sanitizer but they do not allow us to use it. It is strictly for the guards.

21. We have one soap dispenser at the entrance to the toilettes and it was only installed seven (7) or eight (8) days ago.

22. While I have money in my commissary account, there are no masks, gloves, or hand sanitizer available for purchase. Detainees have been asking for masks for weeks, but there is nothing available.

23. The officers who run the detention center have not trained me or the

other detainees on how to try and limit the spread of COVID-19.

24. I understand that staff at the Krome Processing Center have been confirmed to have COVID-19. I also know that at least one (1) detainee has the virus. I tried asking who they knew had COVID-19, but they wouldn't tell me. I do not know if I have already been exposed to COVID-19.

25. Until very recently, I have not seen officers wearing masks or gloves. Detainees have not been provided masks or gloves. I heard a nurse saying that they have to reuse masks and that they are running out of supplies.

26. I have not witnessed officers washing their hands, and they sometimes do not wear gloves.

27. Officers routinely touch meal trays and other items in the living and eating areas of the detention centers. They also touch detainees when they cuff them or use force against them.

28. I have not been tested for COVID-19, and I am not aware of anyone else, other than the detainee that tested positive, having been tested.

29. I know that there are other people who have chronic illnesses who are high risk for COVID-19 complications.

30. I am particularly worried about my own health because my medical condition has worsened since entering ICE custody. Back in February, during an oncology consultation with Dr. Carlos Dominguez at Larkin Community Hospital, it was discovered that my neurologic conditions had not improved, causing major headaches, dizziness and loss of sensation in perineal region. My musculoskeletal condition has also worsened since being detained in KROME, as I am now experiencing bilateral chronic back pain.

31. Upon conducting a CT scan, Dr. Carlos Dominguez found that there is mildly prominent prostate volume with punctate calcifications, meaning my condition has worsened. The CT scan also showed minimal dilatation in the right

extrarenal pelvis and proximal ureter.

32. At this oncology consultation, Dr. Carlos Dominguez ordered a PSA to assess the progression of biochemical recurrence, a CT abdomen/Pelvis with IV contrast, a NM Bonescan, a CBC and a CMP. Dr. Dominguez also ordered treatment with an androgen-receptor antagonist which can be Lupron, or Enzalutamide. Radiation therapy was also ordered on the contingency that there may be areas of painful bone metastases, as well as follow up labs and consult to go over the results.

33. I was scheduled to have my INDIVIDUAL calendar or FINAL trial hearing date on April 2, 2020; however, the hearing was cancelled indefinitely and/or postponed at the 11th hour. Had I had my hearing on April 2, 2020, I believe I would have won my case and would have been released from detention.

34. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

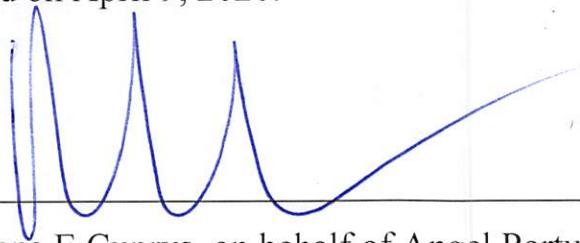
35. I have submitted with ICE at least two (2) prior requests for humanitarian releases based on my medical issues, both of which have been denied. I am now in the process of submitting a third (3) request for a humanitarian release with ICE, through my attorney, based on my medical issues and the most recent recommended treatment plan.

36. If released, I would live with my partner, Franklyn Collado in North Carolina. Alternatively, if I needed to be in Florida, I would live with my parents who reside at **168 W 12th ST, Apt. 1A, Hialeah FL 33010**. In any of these places, I would be able to practice social distancing and self-quarantine.

37. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.

A handwritten signature in blue ink, consisting of three distinct peaks followed by a long, sweeping tail that curves upwards to the right. The signature is written over a horizontal line.

Magdalena E Cuprys, on behalf of Angel Portuondo

ATTORNEY DECLARATION

I, Magdalena Cuprys, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

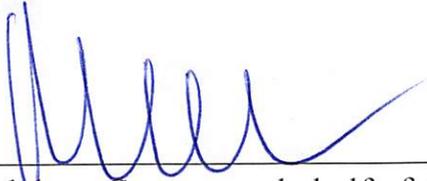
1. My name is Magdalena Cuprys. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Angel Portuondo, in his immigration case at the Krome Immigration Court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Angel Profundo's declaration on his behalf and with his express consent.

3. On April 7, 2020, my paralegal, Maria de la Portilla, attempted to visit Mr. PORTUONDO at the KROME SERVICE PROCESSING CENTER; however, we were told that we could not visit him due to the fact that he was in a pod that is currently under QUARANTINE and was not allowed legal visits.
4. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
5. There are documented cases of COVID-19 in all fifty (50) U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County, Florida and unable to travel to the KROME SERVICE PROCESSING CENTER under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.
6. In light of the above, to protect public health, I am not able to travel to Krome Processing Center in Miami, Florida, to obtain my client's signature.

7. I spoke with Angel Portuondo via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Angel Portuondo has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 8, 2020 at Miami, Florida.



Magdalena Cuprys, on behalf of Angel Portuondo
Attorney
Serving Immigrants Inc.
4011 West Flagler St, Suite 406, Miami, FL 33134

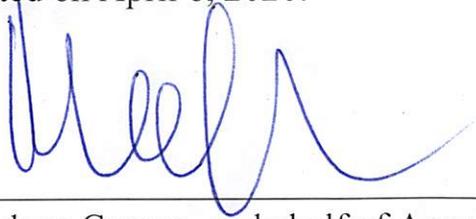
DECLARATION OF ANGEL PORTUNODO

I, Angel Portuondo, am the individual in the attached declaration.

I have authorized my attorney 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 declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 8, 2020.

A handwritten signature in blue ink, appearing to read 'Magdalena Cuprys', written over a horizontal line.

Magdalena Cuprys, on behalf of Angel Portuondo

DECLARATION OF PATRICK GAYLE

I, Patrick Gayle, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 28 years old, and I am from Jamaica.

3. I am currently detained at Krome Service Processing Center in Miami, Florida. I have been detained here since March 12, 2020.

4. I am a Lawful Permanent Resident since 2017. I have two young children – my son is a U.S. citizen who was born in the U.S., and my daughter is a lawful permanent resident. My partner is a lawful permanent resident and is currently pregnant with my third child (our first together). The baby is due at the end of May 2020.

5. I am contesting the charge of inadmissibility against me. My first court hearing was cancelled because my housing unit was locked down in quarantine. The hearing is now scheduled for April 13, 2020, but my unit is in quarantine again and I am afraid my proceedings will be delayed again.

6. I am housed in a building that has 120 people sleeping in the same room. There is a sign on the wall saying the maximum capacity of the room is 80 people. They have us sleeping in bunk beds. Everyone is very close to each other and it is impossible to stay six feet away from other people most of the time.

7. At first they told us to stand 6 feet apart, but now we can't do that because there are too many people in the room and everyone is very close to each other.

8. Last week I developed a cough and requested medical attention. It took three days until I was able to go to the medical unit to see someone. A staff

member took my temperature and gave me two yellow pills. They did not explain anything to me about what was going on or how to protect myself or others from spreading disease. The person who treated me was wearing a mask and gloves.

9. Detainees are not provided gloves or makes. I have funds in my account to use at commissary, but they do not have gloves or masks available to buy.

10. I have seen other detainees in my area who have a cough, and some have complained that they have trouble breathing. Those people were eventually taken out of the pod, but we have not been given any information about whether they had the virus or if we are now at risk because we have been exposed. They took our temperature three days in a row, but they stopped doing that as of 4/8/20.

11. New detainees continue to be brought into our area. About 20 people were taken out of the unit one time to bring the numbers down, but then 50 people were brought in making it even more crowded than it was before.

12. Our unit was put in quarantine again since Saturday. They have not provided us an explanation of why we are in quarantine.

13. During quarantine we are not allowed to go leave the building for meals, so they bring the food to us in our bunks. There is no hand sanitizer or hand washing stations in this area. When we ask to go to the bathroom to wash our hands before eating, the guards give us a hard time and intimidate us into not asking to go as often as we should. The guards have a schedule and a routine for everything so if we ask to wash our hands that throws off their routine and they get angry with us for that.

14. I observed some of the guards and detainees fighting with each other one night. Detainees were asking the guards about someone who was infected and the guards are not able to answer their questions and things turned violent.

15. I am worried about my health and safety inside this detention facility.

16. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

17. If I am released I will live with my father, Anthony Gayle in Garden City, Georgia or with my girlfriend, Shante Parker, in Daytona, Florida. I will be able to socially distance and isolate myself from others as recommended by the CDC.

18. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.

A handwritten signature in blue ink, appearing to read "Laura Kelley", written over a horizontal line.

Laura Kelley, on behalf of Patrick Gayle

ATTORNEY DECLARATION

I, Laura Kelley, declare the following under penalty of perjury pursuant to 28 U.S.C.

§ 1746:

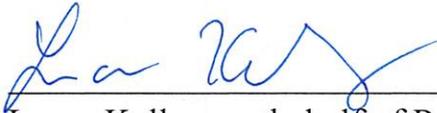
1. My name is Laura Kelley. I am a licensed attorney in good standing in the state of Florida and California.
2. I represent the declarant, Patrick Gayle, in his immigration case in immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Patrick Gayle's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami Dade County,

Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.
6. My staff and I spoke with Patrick Gayle via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Mr. Gayle has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Miami, Florida.



Laura Kelley, on behalf of Patrick Gayle

DECLARATION OF JAVIER ANTONIO ARIAS-MARTINEZ

I, Javier Antonio Arias-Martinez, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have stated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am a 38-year-old native and citizen of the Dominican Republic.

3. I am currently detained at the Krome Service Processing Center, Miami, FL. I have been detained here since on or around January 06, 2020.

4. I am seeking Cancellation of Removal for Legal Permanent Residents that was filed with the Krome Immigration Court on February 04, 2020 along with evidence and a witness list. I have resided continuously in the United States since I was admitted as a legal permanent resident on November 10, 2011. I am the father of a six (6) year old US citizen child, Joshua David Arias. I am an attentive and caring father who financially supports my child and the mother of my child to the best of my abilities.

5. I was initially set for an individual hearing to present my application for relief before the immigration court on March 12, 2020. On March 12, 2020, I was in medical isolation at the Krome detention center on account of respiratory issues I was having that the doctors suspected could have been tuberculosis. On account of my medical status, my March 12, 2020 hearing was postponed to April 02, 2020.

6. During my time in medical, I was tested by the staff and my results for tuberculosis ultimately came back negative despite my symptoms. I was informed on or about March 18, 2020 that I had tested positive for HIV. This was the first time

I had ever been informed of having this severe medical condition. My HIV leaves me susceptible to complications if I were to be exposed to COVID-19 as I have a severe immune system deficiency. I fear the virus would be fatal for me due to my already weakened health.

7. I informed my attorney telephonically on that day, March 18, 2020, of my medical condition. My attorney reached out to my Deportation Officer and their supervisors in order to inform them that same day of my condition so they could consider releasing me on account of the ongoing virus pandemic with COVID-19.

8. On March 20, 2020, my attorney was informed and subsequently informed me that my request for release on account of medical considerations was denied.

9. I was subsequently reincorporated into the general population at Krome around March 25, 2020. In general, the pods are crowded, making it not possible to maintain six feet of distance from other people. I was reincorporated into pod 1, building 8. I estimate that there were about seventy (70) people in this pod when I was returned. The pod is open and everyone in that pod sleeps in a shared space. There is about three (3) – four (4) feet in-between the bunk beds. Pod 1 has one shared bathroom and shower area that everyone uses. The bathroom has about eight (8) shower areas that are about two (2) – three (3) feet from each other. During shower times, there is usually five (5) – seven (7) people showering at the same time. Until about two days ago, about April 05, 2020, they finally brought soap to wash our hands which had not been stocked since I was returned to the Pod. I was terrified when I was returned to the general population because I noticed a number of people coughing who appeared to be sick.

10. After I was reincorporated into the general population, they would bring new detainees in daily which they only stopped recently on or around April 01, 2020. It got so bad that individuals commenced a hunger strike to protest them bringing in

new detainees around this time. They would bring in around five (5) – six (6) detainees on average a night prior to April 01, 2020. Of the new detainees coming in, they had to take out a Cuban detainee who was sick with fever. They finally pulled him out when he displayed a very high fever in the dining room. His fever was so high, that he was shaking. About four (4) days after the Cuban detainee was removed, they removed a second detainee from Mexico. The Mexican detainee was also displaying fever, and this was why they pulled him. When these individuals complained of their conditions, they would tell them the same thing they told me when I was suffering from my respiratory issues, which was to make a request on the tablet. When I was seen, it was six (6) days after I had made my request through the tablet and by then, I was so weak they had to transport me in a wheelchair.

11. On April 02, 2020, the immigration court cancelled my hearing the day it was to take place. On April 07, 2020, the court reset my hearing date for May 07, 2020 despite my attorney having filed and notified the court of the underlying health concerns in my case on April 06, 2020 through a written motion filed with the court.

12. The detention center is set up so that detainees are close to each other when we eat. We eat together in close quarters, where there are tables with chairs secured to the floor. It is not possible to move the seating. As a result, we are forced to eat near one another. We are now in the third quarantine in Pod 1.

13. While I have money in my commissary account, there are no masks, gloves, or hand sanitizer available for purchase. Detainees have been asking for masks, but there is nothing available. The only people who wear personal protective gear are the guards.

14. The officers who run the detention center have not trained me or the other detainees on how to try and limit the spread of COVID-19. They have not even spoken to us regarding the current pandemic.

15. I have not been tested for COVID-19, and I am not aware of anyone

else in detention having been tested.

16. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

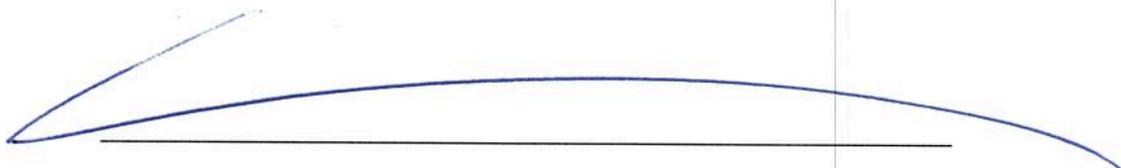
17. I am have submitted with ICE, through my attorney, a Request for Release based on my medical issues which was denied March 20, 2020. My day to see my Deportation Officer is Wednesday but the Deportation Officers have not been around for about two (2) weeks to see anyone.

18. If released, I would live with my family in Florida, my son Joshua and his mother Angelica in Orlando, FL, I would be able to practice social distancing and self-quarantine.

19. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 7, 2020.



Felipe Montoya, on behalf of Javier Antonio Arias-Martinez

ATTORNEY DECLARATION

I, Felipe Montoya, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

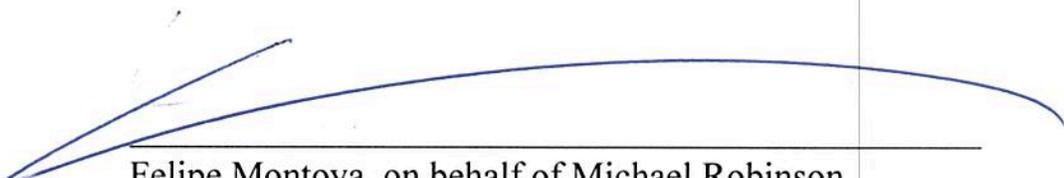
1. My name is Felipe Montoya. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Javier Antonio Arias-Martinez, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Javier Antonio Arias-Martinez' declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection

(CDC) has issued statements warning that individuals are at a higher risk of infection when traveling.

5. In light of the above, to protect public health, I am not able to travel to the Krome Service Processing Center, Miami, FL, to obtain my client's signature.
6. I spoke with Javier Antonio Arias-Martinez via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Javier Antonio Arias-Martinez has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 7, 2020 at Miami, Florida.



Felipe Montoya, on behalf of Michael Robinson
Prada Urizar PLLC
3191 Coral Way
STE 500
Miami, FL 33145

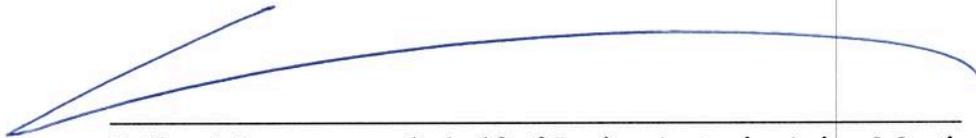
DECLARATION OF JAVIER ANTONIO ARIAS-MARTINEZ

I, Javier Antonio Arias-Martinez, am the individual referred to in the attached declaration.

I have authorized my attorney 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 declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 7, 2020.

A handwritten signature in blue ink, appearing to read 'Felipe Montoya', written over a horizontal line.

Felipe Montoya, on behalf of Javier Antonio Arias-Martinez

DECLARATION OF ABDUL JALLOH

I, Abdul Jalloh, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have stated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 27 years old, and I am from Sierra Leone.

3. I am currently detained at Krome Detention Center at the Krome Behavioral Health Unit (KBHU) in Miami, Florida. I have been detained here since on or around September 12, 2019.

4. Before coming to Krome, I was at Farmville Detention Center in Farmville, Virginia since on or around November 28, 2018.

5. I have been a lawful permanent resident since 2002.

6. My Uncle, Alie Sahid, who has had legal custody over me since I was a child is a United States Citizen, my mother, Mabinty Jalloh is a United States Citizen, and my four-year-old son, Deon Jabbie, is a United States Citizen.

7. I am seeking Asylum, Withholding of Removal, and protection under the Convention Against Torture, due to persecution I experienced as a homosexual male and will face if I was forced to return to Sierra Leone.

8. I suffer from Major Depression Disorder, hallucinations, Paranoia and Delusion Disorder, traumatic brain injury, alcohol abuse and withdrawal, borderline personality disorder, and schizophrenia and childhood respiratory issues. I am currently on Zoloft a sertraline medication used to treat major depression has been linked to increasing risks for breathing and respiratory issues. My mental conditions, Major Depression and sertraline medications along with my

childhood respiratory issues leave me susceptible to complications if I were to be exposed to COVID-19. The virus is known to attack the lungs, and mine are weakened by my medical conditions. I fear the virus would be fatal for me due to my already weakened health.

9. I have had five or six different cellmates since I arrived at Krome Detention Center at the . I have been detained with another person in a cell, which is very small. We share a bathroom and everything else with everyone in our area. The bathroom is easy to access but you have to go outside the room to access it.

10. I am able to bathe at least once a day.

11. I wash my hands before and after eating.

12. The cells are small and the beds have the mattresses close to one another. It is not possible to stay six feet away from cellmates.

13. When new detained men were placed into my room, they were put there without having been tested to confirm they do not have COVID-19. Only one of my cellmates said he was quarantined for a couple of days before he was put in my cell. Most of them said that they had not been quarantined.

14. I am very concerned because one of my detainees in our pod had a cough and was sick. He put in a request to see a doctor, but they said he wasn't a priority so he didn't see a doctor. He was not isolated from the rest of us.

15. The detention center is set up so that detainees are close to each other when we eat. We eat together in close quarters, where there are tables with chairs secured to the floor. It is not possible to move the seating. As a result, we are forced to eat near one another.

16. The detainees serve the food and they only wear beard nets and gloves

17. I am on the cleaning team for the KBHU.

18. I have access to gloves but no masks when I am cleaning and I get \$7/week

19. I have not been trained on hygiene measures in order to limit the spread of infectious disease while cleaning.

20. In general, the pods are crowded, making it not possible to maintain six feet of distance from other people. More people keep coming into the detention center.

21. We have one hand sanitizer available in the area near the nurse's station where we take our medicine, but we are only in that area to take our medicine and it's shared by everyone. We have our own soap and we are expected to make it last until it is distributed again, like once a week. I often use less soap than I need because I am worried about running out.

22. While I have money in my commissary account, there are no masks, gloves, or hand sanitizer available for purchase. Detainees have been asking for masks for weeks, but there is nothing available.

23. The officers who run the detention center have not trained me or the other detainees on how to try and limit the spread of COVID-19.

24. I understand that staff at Krome Detention Center have been confirmed to have COVID-19. I also heard that a detainee has the virus. I tried asking who they knew had COVID-19, but they wouldn't tell me. I do not know if I have already been exposed to COVID-19.

25. Until very recently, I have not seen officers wearing masks or gloves. Detainees have not been provided masks or gloves.

26. I do not see the guards regularly washing their hands

27. I have seen the guards touch their face and enter our living spaces and touch items in there.

28. Officers routinely touch meal trays and other items in the living and eating areas of the detention centers. They also touch detainees when they cuff them or use force against them.

29. A few days ago, we had a recent incident after there was an emergency medical situation that was declared over the speakers. The guards all rushed to the area where a detainee was on the floor. We were not informed if the medical situation was due to COVID-19.

30. There was a Spanish speaking detainee who was taken away a few weeks ago and sent to a hospital where he tested positive for COVID-19. I do not know if I had any contact with this detainee because I was not told who he was.

31. I have not been tested for COVID-19, and I am not aware of anyone else in detention having been tested.

32. I know that there are other people who have chronic illnesses who are high risk for COVID-19 complications, but they have not been put in the quarantine pod.

33. I am particularly worried about my own health because my medical condition has worsened since the spread of COVID-19 at Krome Detention Center. It is extremely difficult to take care of my mental health while there is a pandemic but I am unable to protect myself from the virus. Since I do not have resources, such as PPE material, face masks, gloves, or access to my own hand sanitizer I am constantly worried that I will contract COVID-19 which increases my anxiety and worsens my medical conditions of Major Depression Disorder, hallucinations, Paranoia and Delusion Disorder, traumatic brain injury, alcohol abuse and withdrawal, borderline personality disorder, and schizophrenia and childhood respiratory issues.

34. I have asked the medical staff at Krome Detention Center to provide me with me with proper PPE. Since the medical staff have not been responsive to me before the COVID-19 threat, it is likely that they lack the capacity to handle COVID-19 cases at Krome.

35. I have seen a decrease in medical staff overall.

36. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

37. I am also submitting with ICE, through my attorney, a Request for Humanitarian Release based on my medical issues.

38. If released, I would live at 55 Hampton Park Road, Stafford, VA 22554 with my United States Citizen Uncle, Mr. Alie Sahid who has had legal custody over me since I was a child, in Virginia. My uncle is a nurse and has been extremely vital in combating COVID-19, fighting on the front lines, taking care of numerous patients and saving American lives. He is well prepared and has the knowledge and resources to take care of me as well as help me follow all sanitary protocols during this dangerous pandemic. Due to his specialized knowledge, I would be able to practice social distancing and self-quarantine.

39. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.



Jocelyn Ball, on behalf of Abdul Jalloh

ATTORNEY DECLARATION

I, Jocelyn Ball, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Jocelyn Ball. I am a licensed attorney in good standing in the state of Illinois..
2. I represent the declarant, Abdul Jalloh, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Abdul Jalloh's's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County,

Florida and unable to travel to Krome under a state ‘Stay at home’ order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client’s signature.
6. I spoke with Abdul Jalloh via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Abdul Jalloh has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Miami, Florida.



Jocelyn Ball, on behalf of Abdul Jalloh
Catholic Legal Services
6565 Taft Street
Ste 401
Hollywood, FL 33024

DECLARATION OF ABDUL JALLOH

I, Abdul Jalloh, am the individual referred to as Abdul Jalloh in the attached declaration.

I have authorized my attorney 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 declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020.



Jocelyn Ball, on behalf of Abdul Jalloh

DECLARATION OF DARWYN YOVANNY NAVARRETE SANCHEZ

I, Darwyn Yovanny Navarrete Sanchez, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 38 years of age. I was born in Honduras.

3. I am currently detained at the Krome Service Processing Center in Miami, Florida. I have been detained here since March 19, 2020.

4. I have one United States citizen child. I have an application for asylum pending that was filed before my detention started, and I will file for Cancellation of Removal for Certain Non-Permanent Residents. A copy was filed with the Immigration Judge together with my Motion for Bond Hearing and Custody Redetermination. My bond hearing was scheduled for April 2, 2020, then cancelled like many if not all the hearings that week. My hearing has been rescheduled for May 7, 2020. An over 30-day delay between hearings. A request for my release to my deportation officer has not been approved. A Proposed Joint Motion for Bond was filed with the Office of the Chief Counsel, but no response has been received to the motion.

5. I am a former smoker and occasionally I continue to smoke when suffering from stress. I also suffer from recurring headaches and take 800mg of ibuprofen to reduce the pain. I am concerned that smoking has caused damage to my lungs and therefore I may be more susceptible to fatal lung damage from COVID-19. My current living situation at the Krome Service Processing Center is not helping me prevent contracting the virus.

a. There are 66 detainees sleeping in my quarters.

b. We sleep and eat too close in proximity to one another. We are

practically stuck to one another.

- c. We are always well within 6ft from one another. It is practically impossible to keep 6ft away from one another.
 - d. There is no soap and/or hand sanitizer available.
 - e. I cannot wash my hands at night when enclosed with the other 66 detainees.
6. Overall operations are also not preventing the spread of the virus.
- a. Other detainees prepare and touch food.
 - b. Other detainees touch and distribute clothing.
 - c. In neither case are detainees wearing gloves or another form of PPE.
 - d. There is no training or hygiene measures in order to limit spread of infectious disease while completing these tasks.
 - e. There are no supplies such as soap, hand sanitizer, PPE available for purchase.
 - f. I have \$60.00 in my commissary account.
 - g. The guards/staff/ICE officials are wearing protective gear in the center.
 - h. The guards/staff are regularly washing their hands.
 - i. They touch detainees and enter our living spaces and touch items in there.
 - j. I have observed new detainees being brought in over the last few weeks.
7. I recently requested an appointment with the medical staff to address my headaches, but I have not been contacted or assigned an appointment.
8. There have been no measures or education to help us prevent getting or passing the virus. Yesterday the television was turned off all day and there have been no formal announcements regarding the virus or health.

9. I believe there are sick individuals at the Krome Service Processing Center. Individuals have been taken to the hospital and I've seen people in wheel chairs.

10. I have not seen any increase in medical staffing or observed any medical screenings being done.

11. I have not been evaluated in any medical fashion after my initial evaluation upon detention on March 19, 2020.

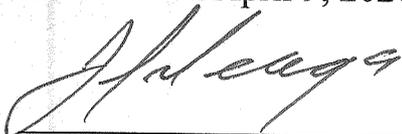
12. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

13. If released, I will return to my home with my girlfriend at 10730 NW 22nd Avenue Rd., Miami, Florida 33167. She has not contracted the virus and currently is showing no symptoms of the same. She has practiced all the necessary social distance techniques required. I am also prepared to isolate myself for the necessary period of time after release to ensure that my child and the public in general do not contract the virus as a result of my release. My child lives with his mother at a different address, so he is not at risk after my release.

14. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.



Javier Arteaga, Esq., on behalf of Darwyn Yovanny Navarrete Sanchez

ATTORNEY DECLARATION

I, Javier Arteaga, Esq., declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

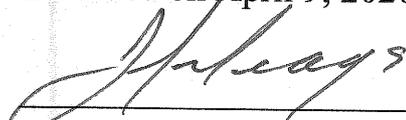
1. My name is Javier Arteaga. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Darwyn Yovanny Navarrete Sanchez, in his immigration case in the Krome Service Processing Center immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Mr. Darwyn Yovanny Navarrete Sanchez's declaration on his behalf and with his express verbal consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of

infection when traveling. In addition, I am a resident of Miami-Dade County, Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Service Processing Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Darwyn Yovanny Navarrete Sanchez via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Darwyn Yovanny Navarrete Sanchez has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Miami, Florida.



Javier Arteaga, on behalf of Darwyn Yovanny Navarrete Sanchez

DECLARATION OF APARICIO PEREZ-JERONIMO

I, Aparicio Perez-Jeronimo hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I was born on August 18, 1987 in Huehuetenango, Guatemala

3. I am currently detained at Krome Service Processing Center in Miami, Florida. I have been detained here since 03/21/2020.

4. I am seeking Withholding of Removal.

5. Now I have been feeling better but, about 4 days ago, I started feeling sick, having cold symptoms, and many of my my cellmates have been having the cold or flu symptoms, and this is something that I am extremely worried about.

6. We are about 70 people in the same room or area where we sleep, they often change us without explaining the reasons. No matter how much I try to protect myself from having contact with other inmates, sometimes it's impossible to be 2 ft apart. I see that not every inmate or guard are taking the precautions due to this pandemic. We sleep in bunk beds, and the beds are about 4 of 5 ft apart.

7. The guards are using face masks and gloves, but not the inmates. Once the pandemic started, we tried to cover our nose and mouth with towels to protect ourselves, but we were told to take them off because we could not cover our faces. Detainees are the ones that have to do the cleaning, but without any additional protection other than gloves. I have seen multiple new detainees, about 15 in the last 2 weeks.

8. Everytime someone gets sick with cold symptoms, the only thing they can do is make them wait like 5 to 8 days before they can see a doctor, or if the person gets worse, they take them to another area, but they only come back with

some pills for the headache, but honestly it's extremely scary to see how exposes we are to the virus and it seems like nobody cares.

9. The only way we have to find out what is really happening with the pandemic is by the information guards give us and our families once we call them, but we only know there are thousands of positive COVID-19 cases in the US.

10. Last week, one of the people that were sick said one of them was tested positive, but that's all we know. He was here with us in the same area, that means we can also be sick without even knowing.

11. No one is getting the test for people that are sick, nobody is really paying attention to the people that are getting worse, one of the guys in this area was having difficulty breathing, and only on those occasions is when guards really pay attention to the sick inmates.

12. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings. I have a friend that is willing to let me stay in his home, where I would be able to be safe and take care of myself.

13. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 09th, 2020.

A handwritten signature in black ink, appearing to read "Laura F. Kelley", written over a horizontal line.

Laura F. Kelley, on behalf of Aparicio Perez

CERTIFICATION

I, Laura Pereira, declare that I am proficient in the English and Spanish languages.

On April 09th, 2020, I read the foregoing declaration to Aparicio Perez and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 09th, 2020.



Laura M Pereira

ATTORNEY DECLARATION

I, Laura F Kelley, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

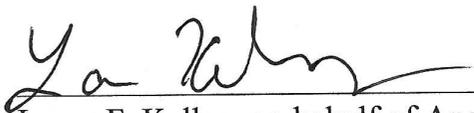
1. My name is Laura Kelley. I am a licensed attorney in good standing in the state of Florida. I am an inactive attorney in good standing in the state of California.
2. I represent the declarant, Aparicio Perez, in his immigration case in Krome Immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Aparicio's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County,

Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Aparicio via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Aparicio has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 09th, 2020 at Miami, Florida.

A handwritten signature in cursive script, appearing to read 'Laura F. Kelley', written over a horizontal line.

Laura F. Kelley, on behalf of Aparicio Perez

DECLARATION OF JOSE CHAVEZ

A NO. 094-825-822

I, Jose CHAVEZ, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have stated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I am 48 years old, and I am from Honduras.
3. I am currently detained at the KROME SERVICE PROCESSING CENTER in Miami, Florida. I have been detained here since **July 19th, 2019**.
4. I have a pending Form EOIR-42B, application for cancellation of removal for non-lawful permanent residents and a pending T visa. I have resided in the United States for over ten (10) years. I am a person of good moral character and have three (3) United States Citizen children, one of whom has special needs.
5. I suffer from poor health and have been hospitalized in the past due to chest pains. I have a history of asthma and nephrolithiasis. My poor health leaves me susceptible to complications if I were to be exposed to COVID-19. The virus is known to attack the immune system and mine is weakened by my poor health and history of chest pains. I fear the virus would be fatal for me due to my already weakened health.
6. I have had many different cellmates since I arrived at the Krome Service Processing Center, making it more probable to have had more contact with various potentially infected individuals during the processing and transportation process.
7. I am currently in one of the dorms at the Krome Service Processing Center that is not under quarantine.
8. I heard that on April 7th 2020 there was a protest in another pod because the guards were trying to add more beds to the door and move potentially sick people into a dorm with people that were not ill. That day the television, phones and tablets were not working.

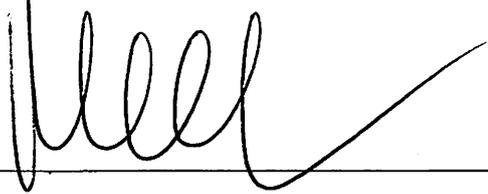
9. I am currently detained with forty one (41) other people in a pod. We share a bathroom with five (5) toilets and nine (10) showers and everything else within the room. The toilets and showers are less than six (6) feet apart. We all use the same showers, which are not regularly cleaned.
10. They took around 19 people from my pod but I do not know where they went.
11. The pods are small and the bunk beds have the mattresses close to one another. I sleep on the top bunk and another detainee used to sleep on the bottom bunk, but he is one of the ones that they took away. They have not brought me a new bunkmate yet. It is not possible to stay six (6) feet away from cellmates.
12. Four (4) days ago, three (3) new people came into my pod. When the new detained men were placed into my room, I think that they were put there after being placed in quarantine but I do not know if they were tested to confirm they do not have COVID-19.
13. I am very concerned because I have heard many rumors that at least one (1) detainee has tested positive for COVID-19. The two (2) guards watching him subsequently also tested positive for COVID-19.
14. Further, the detention center is set up so that detainees are close to each other when we eat. All forty one (41) of us eat together in close quarters. There is no separation. The tables area forces us to eat right next to each other. Neither the tables or chairs can be moved.
15. In general, the pods are crowded, making it not possible to maintain six (6) feet of distance from other people. More people keep coming into the detention center.
16. We do not have hand sanitizer available in the common area and they do not provide us with any hand sanitizer. We see the guards have one (1) hand sanitizer but they do not allow us to use it. It is strictly for the guards.
17. Every day they give us soap and other hygiene products such as toothpaste, tooth brush, etc. They do not provide us with any antibacterial gel, alcohol, masks or gloves.
18. While I have money in my commissary account, there are no masks, gloves, or hand sanitizers available for purchase. Detainees have been asking for masks for weeks, but there is nothing available.

19. The officers who run the detention center have told us to maintain six (6) feet distance between detainees but that is not possible to abide by this rule due to the extremely small living conditions in which we are currently living. They have told us not to touch our faces and to constantly wash our hands.
20. I understand that staff at the Krome Processing Center have been confirmed to have COVID-19. I also know that at least one (1) detainee has the virus. I tried asking who they knew had COVID-19, but they wouldn't tell me. I do not know if I have already been exposed to COVID-19.
21. Until very recently, three or four days ago, I had not seen officers wearing masks or gloves. Detainees have not been provided masks or gloves. I heard a nurse saying that they have to reuse masks and that they are running out of supplies.
22. I have not witnessed officers washing their hands, and they sometimes do not wear gloves.
23. Officers routinely touch meal trays and other items in the living and eating areas of the detention centers. They also touch detainees when they cuff them or use force against them.
24. I have not been tested for COVID-19, and I am not aware of anyone else, other than the detainee that tested positive, having been tested.
25. I know that there are other people who have chronic illnesses who are high risk for COVID-19 complications.
26. I am particularly worried about my own health because my medical condition has worsened since entering ICE custody.
27. I was scheduled to have my INDIVIDUAL calendar or FINAL trial hearing date on March 16, 2020; however, due to the COVID-19 pandemic, my witnesses were not able to attend said hearing and the hearing was postponed to April 24, 2020, but I am unsure if it will be postponed again due to the COVID-19 pandemic.
28. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

29. I was granted bond in the amount of \$10,000 by Immigration Judge Rene D. Mateo; however, the government appealed that bond and the Board of Immigration Appeals reversed the Immigration Judge and took my bond away.
30. I am now in the process of submitting a request for a humanitarian release with ICE, through my attorney, based on my medical issues.
31. If released, I would live with my spouse and three (3) children at **5600 SW 38th Court Davie, FL 33314**. Being in my home with my immediate family would allow me to practice social distancing and self-quarantine.
32. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.

A handwritten signature in black ink, appearing to read 'Magdalena E Cuprys', written over a horizontal line.

Magdalena E Cuprys, on behalf of Jose Chavez

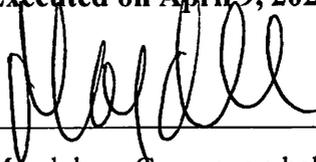
ATTORNEY DECLARATION

I, Magdalena Cuprys, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Magdalena Cuprys. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Jose Chavez, in his immigration case at the Krome Immigration Court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Jose Chavez's declaration on his behalf and with his express consent.
3. On April 7, 2020, my paralegal, Maria de la Portilla, attempted to visit Mr. CHAVEZ at the KROME SERVICE PROCESSING CENTER; however, we were told that we could not visit him due to COVID-19.
4. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposable vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
5. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County, Florida and unable to travel to Georgia under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.
6. In light of the above, to protect public health, I am not able to travel to Krome Processing Center in Miami, Florida, to obtain my client's signature.
7. I spoke with Jose Chavez via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Jose Chavez has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Miami, Florida.



Magdalena Cuprys, on behalf of Jose Chavez

Attorney

Serving Immigrants Inc.

4011 West Flagler St, Suite 406, Miami, FL 33134

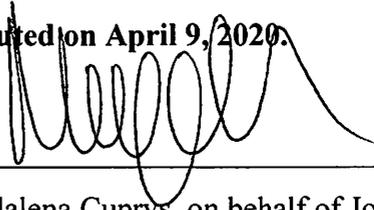
DECLARATION OF JOSE CHAVEZ

I, Jose Chavez, am the individual in the attached declaration.

I have authorized my attorney 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 declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

~~Executed on April 9, 2020.~~

A handwritten signature in black ink, appearing to read 'Magdalena Cuprys', written over a horizontal line.

Magdalena Cuprys, on behalf of Jose Chavez

DECLARATION OF CESAR ARIEL MENDEZ ESCOBAR

I, Cesar Ariel Mendez Escobar, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 36 years old and a Guatemala national.

3. I am currently detained at Krome Service Processing Center in Miami, Florida.

4. I have a partner with whom I have 2 children born in the United States.

5. I suffer from High Cholesterol and High Triglycerides.

6. We are given soap but not hand sanitizer. I believe there is some for purchase at commissary but I do not have any money for that additional expense.

7. I have seen guards wearing gloves but not many wearing masks.

8. When we try to wear something to cover our mouths and noses (such as pulling our shirts up to cover our mouth), guards get upset, yell at us and tell us to pull our shirts down.

9. I have not received any gloves or masks with which to protect myself.

10. I have not seen increased cleaning or measures for disinfecting areas.

11. Fellow detainees are responsible for cleaning. I have seen them wearing gloves while cleaning and some wearing masks while cleaning.

12. Fellow detainees are responsible for cooking and serving meals. I have seen them wearing gloves and some wearing masks as well while performing these functions.

13. Fellow detainees do not wear gloves or masks during the day.

14. I am not able to keep 6ft distance from other detainees most of the

time. When we eat, we are in very close contact with each other.

15. We have not been given any guidance or classes regarding protection measures to keep ourselves safe from COVID19.

16. There are no hand sanitizers so that we can clean our hands throughout the day.

17. Guards are going in and out of the detention center and even though they could be bringing in the virus, they still touch all of our surfaces without gloves.

18. I am afraid for my life because I have high cholesterol and high triglycerides, I am at higher risk of surviving COVID19 if I am infected. High cholesterol affects your heart health and I feel that we are just sitting here waiting to be infected without being able to do anything for ourselves.

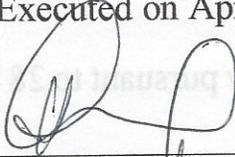
19. If released, I will go live with my partner and children in Fort Pierce, Florida. I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

20. If released, I will abide by and observe any and all health recommendations made by the Centers for Disease Control and any other local authorities.

21. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 11, 2020.



Kenia Garcia

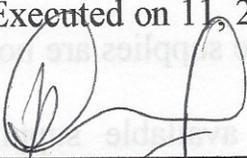
CERTIFICATION

I, Kenia Garcia, declare that I am proficient in the English and Spanish languages.

On April 10, 2020, I read the foregoing declaration to Cesar Ariel Mendez Escobar and orally translated it faithfully and accurately into Spanish to the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on 11, 2020.



Kenia Garcia

ATTORNEY DECLARATION

I, Kenia Garcia, declare the following under penalty of perjury pursuant to 28 U.S.C.

§ 1746:

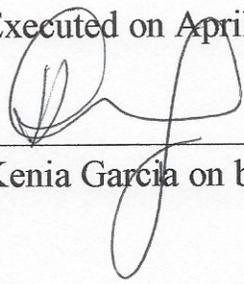
1. My name is Kenia Garcia. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Cesar Ariel Mendez Escobar, in his immigration case in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Cesar Ariel Mendez Escobar's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami Dade County,

Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Service Processing Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Cesar Ariel Mendez Escobar via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Cesar Ariel Mendez Escobar has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 11, 2020 at Miami, Florida.



Kenia Garcia on behalf of Cesar Ariel Mendez Escobar

DECLARATION OF ELISEO A. ZAMORA MENDOZA

I, Eliseo Antonio Zamora Mendoza, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 53 years old, and I am from Nicaragua.

3. I am currently detained at Krome Service Processing Center in Miami, Florida. I have been detained here since March 15, 2020.

4. I am married to a US Citizen and currently am a beneficiary of my wife's Petition I-130 being processed by US Citizen and Immigration Service (USCIS).

5. Additionally, I filed a Motion to Rescind in Abstentia Removal order and reopen proceedings based on lack of notice with the San Antonio, Texas Court on March 24, 2020 and requested an automatic stay of Removal (Motion to Reopen).

6. On April 7, 2020, my deportation officer, Carlos A. Sanchez expressed to my attorney that I am in mandatory detention and if my case is reopened I will need to request bond to the Immigration Judge (IJ) to be released from detention, assuming it is granted.

7. Given the COVID-19 pandemic, it is unknown when will the Motion to Reopen be reviewed and decided by the IJ.

8. I fear for my life because I don't know when I will be released and the risk of getting sick with Coronavirus increases with age. As said, I am 53 years old.

9. Additionally, I am a smoker and had pneumonia in the past. That coupled with my age may compromise my immune system during the pandemic.

10. There are currently 61 detainees in my room. The beds are only 3-feet apart.

11. The detainees do not wear any protective gear like gloves and/or face masks in order to limit the spread of diseases, particularly COVID-19.

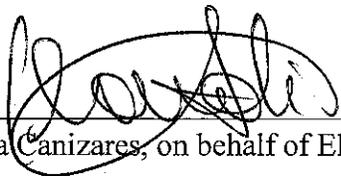
12. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

13. If released, I will return to my home with my wife at 4376 West, 11 Lane, Hialeah, Florida 33012 and will comply with the social distancing and self-quarantine to avoid exposure to this dangerous virus.

14. I have authorized my attorney to sign on my behalf given the impossibility of visitation due to the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I declare under penalty of perjury that the things described above are true and correct.

Executed on April 10, 2020.



Claudia Canizares, on behalf of Eliseo A. Zamora Mendoza

ATTORNEY DECLARATION

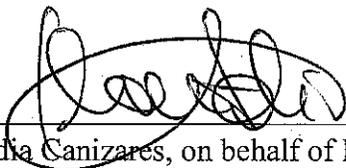
I, Claudia Canizares, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Claudia Canizares. I am a licensed attorney in good standing in the state of Florida. I am an inactive attorney in good standing in the state of Florida.
2. I represent the declarant, Eliseo A. Zamora Mendoza, in his immigration case at the immigration court in San Antonio, Texas. Out of necessity in light of the COVID-19 pandemic, I signed Mr. Eliseo A. Zamora Mendoza's declaration on his behalf and with his express consent.

3. Krome Service Processing Center in Miami has been closed for several day now and it is not possible to visit our client. In addition, coordinating a phone call with my client has also been very difficult because even when he is able to call, the phone call only lasts a couple of minutes despite the fact his wife has deposited money into his account.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Dade County, Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.
5. In light of the above, to protect public health, I am not able to travel to the Krome Service Processing Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Mr. Eliseo A. Zamora Mendoza via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Mr. Zamora Mendoza has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10, 2020 in Miami, Florida.

A handwritten signature in black ink, appearing to read 'Claudia Canizares', written over a horizontal line.

Claudia Canizares, on behalf of Eliseo A. Zamora Mendoza

DECLARATION OF LAZARO OCANA GUZMAN

I, Lazaro Ocana Guzman, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 39 years old, and I am from Mexico.

3. I am currently detained at Krome Detention Center in Miami, Florida. I have been detained approximately on March 20, 2020.

4. I am seeking Withholding of Removal, CAT, and U visa, because I am a victim of domestic violence, and I am afraid to return to my country.

5. I suffer frequent tonsillitis. My tonsillitis gets worse with the cold, and my tonsils become inflamed to the point of not allowing me to speak, which puts me in a risky condition if I were infected with Covid-19

6. We slept 60 people all together in a big facility, the beds are approximately 5 feet apart, there are no divisions between the beds, we have a guard who takes care of us, and we slept in that room because we were quarantined for 5 days at 60 people, the quarantine ended yesterday.

7. We are 5 feet away to sleep and 1 feet away to eat, but only the distance is respected when there are cameras, when there are no cameras they crowd us to eat

8. We are never able to remain 6 feet away from other people.

9. There is no soap or hand sanitizer for washing hands

10. We can bathe whenever we want. To bathe we have no ability to distance ourselves. It is a single bathroom for all.

11. We are able to wash our hands when we want but there is no soap provided.

12. Detainees prepare food. The authorities call us to work. It is voluntary, and they pay \$ 1 a day to work in the cafeteria. I have not worked, but the detainees who work in the cafeteria are given a pair of gloves. They do not have masks to prepare food, so they put the hair net in their mouths, but that is a net, that does not protect them.

13. They pay detainees \$1 a day to work in the cafeteria or to clean. The staff does nothing. There is no one else here to do anything, so detainees do everything.

14. When working in the detention center, they detainees are only given gloves, no masks.

15. As far as I know, the detainees who work in the center have not been trained. They have not told us anything except that we should wash our hands, but they do not give us soap. We had soap for three days but they took it away again. They have not explained anything to us.

16. From what I can observe, they give a single pair of gloves to those who do cleaning and work in the cafeteria. At 5pm every day they give us toiletries such as toilet paper, toothpaste, soap for bathing (not for washing our hands). We do not have to pay for these moneys.

17. I have money in my commissary account.

18. After the quarantine of 5 days, the guards began to wear masks, at the beginning they did not use them. Also, the guards would take off their masks to speak to us. The only ones who keep the masks on are the guards who take care of us, one guard for 60 detainees. I only see the guards using hand sanitizer, not washing their hands.

19. Guards touch the detainees with the same glove every time we enter and leave.

20. The nurses took our temperature about 2 times during the quarantine and touched us with gloves.

21. There are no announcements, there is no formal education, there is no social distance, only the quarantine of 60 people for 5 days.

22. From what I know, two guards and a detainee are sick.

23. I believe recently they have increased the number of guards working.

24. I have not received any individualized medical treatment despite my illnesses.

25. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

26. If I released, I would live with my brother at 2002 Auburn street, Largo, Fl 33770, I have my room available at that address where I can practice social distancing and self-quarantine.

27. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 10, 2020.

A handwritten signature in blue ink that reads "Laura F. Kelley". The signature is written in a cursive style with a horizontal line underneath it.

Laura F. Kelley, on behalf of Lazaro Ocana Guzman

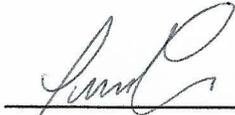
CERTIFICATION

I, Diana Posada, declare that I am proficient in the English and Spanish languages.

On April 9, 2020, 2020, I read the foregoing declaration to Lazaro Ocana Guzman and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 10, 2020.



Diana Posada

ATTORNEY DECLARATION

I, Laura F. Kelley, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Laura F. Kelley. I am a licensed attorney in good standing in the state of Florida. I am an inactive attorney in good standing in the state of California.
2. I represent the declarant, Lazaro Ocana, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Ocana's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami Dade County,

Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.
6. My staff and I spoke with Lazaro Ocana Guzman via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Lazaro Ocana Guzman has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10 2020 at Miami, Florida.



Laura F. Kelley, on behalf of Lazaro Ocana Guzman

DECLARATION OF JUAN CARLOS ALFARO GARCIA

I, Juan Carlos Alfaro Garcia, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have stated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 39 years old, and I am from Mexico.

3. I am currently detained at Krome Detention Center in Miami, Florida. I have been detained here since on or around March 6, 2020.

4. I am seeking Asylum, Withholding of Removal, and protection under the Convention Against Torture, due to persecution my family has experienced in Mexico. I was ordered removed in 2008 and re-entered that same year. I have been present in the US since. My wife, Guadalupe Alfaro, is a U.S. Citizen. I have an approved I-130. If my matter were to be reopened, I would seek Cancellation of Removal for certain Non-Permanent Residents.

5. I suffer from asthma. My asthma leaves me susceptible to complications if I were to be exposed to COVID-19. The virus is known to attack the lungs, and mine are weakened by my asthma. I fear the virus would be fatal for me due to my already weakened health.

6. There are 68 people in my cell area at the Krome Detention Center. We are all in close contact and are all together when we sleep, eat, go outside, etc.

7. I sleep on a bunkbed and am surrounded by multiple other bunkbeds, all occupied by inmates. It is not possible to stay six feet away from cellmates.

8. I do not know if every single inmate in my cell area has been tested for COVID-19 and we are not informed if inmates are tested positive for COVID-19.

9. We have not been allowed to watch the news lately so I do not know if anything has been reported within this facility.

10. Some of the guards that we come into contact with are using masks, but certainly not all of the guards. I also have not seen guards using gloves or protective eye gear.

11. I have not seen any of the guards washing their hands or applying hand sanitizer, nor do we have any hand sanitizing stations for the inmates.

12. I am afraid because there are inmates in my cell area with a cough, fever, goosebumps, but nobody tells the rest of us what's wrong with them or why they are feeling sick.

13. None of the guards tell us if individuals have COVID-19; rather, inmates are brought in, detained with the rest of the population, and when some people are relocated, nobody informs us why.

14. When we eat lunch, the guards hand us the lunch trays and I have not seen them wash their hands. They wear masks, but they lower them under their chin so their mouths are visible. I do not see them wiping down the trays before they give us food.

15. We are only asked to stay six feet apart when we go to the cafeteria or the doctor, but there is no way to be so far apart when we are in our cell area because of how many inmates are in there.

16. The detention center is set up so that detainees are close to each other when we eat. We eat together in close quarters, where there are tables with chairs secured to the floor. It is not possible to move the seating. As a result, we are forced to eat near one another.

17. In general, the pods are crowded, making it not possible to maintain six feet of distance from other people. More people keep coming into the detention center.

18. The officers who run the detention center have not trained me or the other detainees on how to try and limit the spread of COVID-19.

19. I understand that staff at the Krome Detention Center have been found to have COVID-19. I haven't heard if any of the inmates have it. I also don't know if I have been exposed to it, but I am afraid.

20. Officers routinely touch meal trays and other items in the living and eating areas of the detention centers. They also touch detainees when they cuff them or use force against them.

21. I have not been tested for COVID-19, and I am not aware of anyone else in detention having been tested.

22. I am particularly worried about my own health because my medical condition has worsened since entering ICE custody. A couple of weeks ago I was able to see a doctor and I was advised to just be careful and keep taking my asthma medication. My bunkmate has also had a dry cough for days.

23. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

24. I am also submitting with ICE, through my attorney, a Request for Humanitarian Release based on my medical issues.

25. If released, I would live with my wife in Southwest Florida, and I would be able to practice social distancing and self-quarantine.

26. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.

Jillian Yanes, Esq.

Jillian Yanes, on behalf of Juan Carlos Alfaro Garcia

ATTORNEY DECLARATION

I, Jillian Yanes, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Jillian Yanes. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Juan Carlos Alfaro Garcia, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Juan Carlos Alfaro Garcia's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Collier County, Florida and unable to travel to Miami-Dade County under a state 'Stay at

home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Juan Carlos Alfaro Garcia via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Juan Carlos Alfaro Garcia has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Naples, Florida.

Jillian Yanes, Esq.

Jillian Yanes, on behalf of Juan Carlos Alfaro Garcia
The Law Office of Jillian Yanes, P.A
2668 Airport Pulling Road South
Naples, Florida 34112

DECLARATION OF JUAN CARLOS ALFARO GARCIA

I, Juan Carlos Alfaro Garcia, have authorized my attorney 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 declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020.

Jillian Yanes, Esq.

Jillian Yanes, on behalf of Juan Carlos Alfaro Garcia

DECLARATION OF MUHAMMAD ALAM KHAN

I, Muhammad Alam Khan, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I was born at Sargodha, Pakistan on March 10, 1962. I am a native and citizen of Pakistan.
3. I am currently detained at the Krome Detention Facility in Miami, Florida. I have been detained here since December 10, 2019. My Alien # is A073 676 705.
4. I have been married to my wife, Sofia Khan, since September 16, 1992, a period of more than 27 years. We have never been separated, except for the time that I have been in Krome. I have been residing permanently in the United States with her since October 14, 1999.
5. I have never been convicted of any criminal offense, except for Sale of Alcohol to a Minor, which occurred nearly 19 years ago in Broward County, Florida on July 24, 2001.
6. We have four children born of said marriage, all of whom are currently residing in the United States. Three of them, ages 26, 24, and 16 are US

Citizens.

7. I am in poor physical condition and suffer from diabetes, high blood pressure, and a weak immune system. I have provided medical records dated May 2, 2014, relative to treatment and medication for Hypertension, Hypercholesterolemia, and Obesity; medical records dated April 18, 2014, relative to back and spinal pain; medical records dated August 11, 2017, relative to treatment and medication for Diabetes, High Cholesterol, and Hypertension; and medical records dated August 16, regarding test results for Diabetes, High Cholesterol, and Hypertension. Krome has copies of my medical records, and they have additional reports of my colds, and leg and back pains.
8. My current living conditions at Krome are as follows:
 - a. I am housed in a large room that contains approximately 45 other inmates. Until recently, we had approximately 60 inmates in the room. I sleep on the bottom of a bunkbed. An inmate sleeps approximately 3-4 feet above me. Others sleep approximately 4-5 feet on either side of me.
 - b. It is virtually impossible to go through the day without coming into close contact with other inmates of the facility.

- c. While we are provided with hand soap on a regular basis, we are not provided with hand sanitizer, masks, gloves, or other protective equipment.
- d. We are permitted to shower once a day, and to wash our hands whenever possible.
- e. To the best of my knowledge, our food is prepared by inmates and staff at Krome. In the past, we ate at the cafeteria; but now, the food is brought to us in our living quarters.
- f. The cleaning of the facility is done by staff at Krome or outside workers. At the present time, these persons wear masks and gloves, but that was not the case a few weeks ago.
- g. We have been advised by staff at Krome regarding proper methods of hygiene. This consists of signs and statements made by camp officials. I do not recall any individualized briefings on the issue.
- h. We have not had any extensive meetings to discuss sanitary measures, and we have not been provided masks, gloves, or other protective equipment.
- i. The facility does provide soap and other cleaning supplies, and we do not need to pay for it. Even though I have funds on hand, I am not permitted to purchase protective equipment.

- j. The staff, as of last week, now wear masks and gloves. They appear to be taking better efforts to protect themselves and the detainees from becoming infected. However, I have been told that at least three staff members at Krome (apparently guards) have been infected by the coronavirus.
- k. Even with the current situation, I have observed new detainees being brought into the facility.
- l. I am also aware that parts of the facility have been shut down 3-4 times because of persons being sick. I do not know if any of the current detainees have contracted the virus, because that information is kept very confidential.
- m. Even with the above, I have not seen any type of mass checkups being done. Temperatures are not checked on a routine basis, and I am aware of many detainees who have complained about the medical treatment, or lack thereof.
- n. As mentioned above, I am not in a good medical condition, and I fear that I am very susceptible to contracting the virus. In the four months that I have been here, I have had a constant cold, cough, and sore throat. I have seen the camp nurse on 4-5 occasions, and I have seen the camp doctor on two occasions (although I have not

seen him for over two months even though I have asked to see him).
Even when I put in a sick notice, it usually takes 2-3 weeks before
I am seen.

- o. Despite my past medical history, which leaves me very vulnerable to contracting the coronavirus, I am not aware of any individualized medical evaluation having been prepared for me even though I have complained of medical issues since being detained four months ago. It is vitally important to determine whether any additional precautionary measures are necessary to protect me from the illness. I am extremely fearful for my life, and I am worried about the heartache that will be caused to my wife of over 27 years, and to my four children and their families should I contract the virus.
9. If I am released from detention, I will comply with any applicable conditions of release including reporting as required. Once the coronavirus pandemic has ended, I will report to ICE so that my return to Pakistan can be promptly executed.
10. During my release I will be living with my wife and children at 4625 NW 58 Street, Tamarac, Florida 33319, where we have lived for many years.
11. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct to the best of my knowledge and belief.

Executed on April 10, 2020, at Miami, Florida.



Philip M. Zyne on behalf of Muhammad Alam Khan

ATTORNEY DECLARATION

I, Philip M. Zyne, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Philip M. Zyne. I am a licensed attorney in good standing in the State of Florida, with offices located at 8877 Collins Avenue, Suite 509, Surfside, Florida 33154.
2. I represent the declarant, Muhammad Alam Khan (Alien #: A073 676 705), who is presently detained at the Krome Detention Facility in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Mr. Khan's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye

protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.

4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County, Florida and I understand that I am unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida, Ron DeSantis, on April 1st, 2020.
5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Muhammad Alam Khan via phone call, the declaration was read to him, and he confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10, 2020 at Miami, Florida.



Philip M. Zyne, on behalf of Muhammad Alam Khan

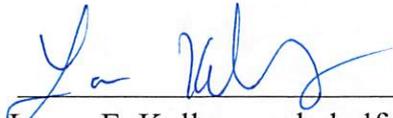
DECLARATION FOR WILDER PEREZ LIMONES

I, Wilder Perez Limones, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I was born on August 8th, 1992 and I am from Mexico. I have 3 U.S. citizen children, 6, 5 and 2 years old respectively.
3. I am currently detained at Krome Detention Center in Miami, Florida. I have been detained since March 2020.
4. My bond hearing was scheduled for April 6th, 2020 but was canceled due to the COVID-19 pandemic.
5. I am extremely worried about my own health since entering ICE custody. Two weeks after I was transferred to Krome detention center, I became sick with flu-like symptoms, I experienced chest pain and nasal congestion, I was sick for two weeks.
6. I have had five or seven different cellmates since I arrived at Krome Detention Center. Two of them also had flu-like symptoms during the same period as I, but we were not able to keep distance since the cell is small and we share the same bathroom.
7. I was told by one of the officers that a new detainee that had tested positive for COVID-19 arrived at the detention center, so me and my cellmates were placed into quarantine by not letting us out of our cell. There are 59 of us in a big space where we sleep about 4 ft apart from each other.
8. We started a hunger strike because nobody would inform us about the situation. Several cellmates have a cough and, when requesting medical attention, we are getting it around two weeks later. So far, they have only taken our temperature, we have not been tested for COVID-19.
9. We were also protesting because they keep bringing new detainees in, disregarding that it may be a risk for infection.
10. The temperature is really low. It's very cold at night and that worsens my allergies.
11. Guards and ICE staff started using masks and gloves only two days ago.

12. I also heard that more detainees have the virus. I do not know if I have already been exposed to COVID-19.
13. When we eat we do it close to each other, there is no possibility for me to stay six feet away from other detainees.
14. We are asked to do cleaning but we are not given gloves or masks.
15. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.
16. If released I would live with my partner and 3 children in Lake Worth or my brother Noel Perez Limones in Lake Worth, in both locations I would be able to practice social distancing and self-quarantine.
17. I have authorized my attorney to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required, I will provide a signature when I am able to do so.

Executed on April 9, 2020.



Laura F. Kelley, on behalf of Wilder Perez Limones

CERTIFICATION

I, Daniela Tulande, declare that I am proficient in the English and Spanish languages.

On April 9, 2020, I read the foregoing declaration to Wilder Perez Limones and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 9, 2020.

Handwritten signature of Daniela Tulande in black ink.

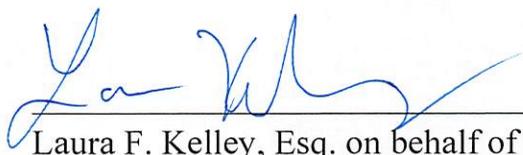
Daniela Tulande

ATTORNEY DECLARATION

1. I, Laura F. Kelley, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:
2. My name is Laura F. Kelley . I am a licensed attorney in good standing in the state of Florida.
3. I represent the declarant, Wilder Perez Limones, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Wilder Perez Limones' declaration on his behalf and with his express consent.
4. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposable vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
5. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling.
6. My staff and I spoke with Wilder Perez Limones via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Wilder Perez Limones has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Miami, Florida.

A handwritten signature in blue ink, appearing to read 'Laura F. Kelley', is written over a horizontal line.

Laura F. Kelley, Esq. on behalf of Wilder Perez Limones

DECLARATION OF LAZARO CARDENAS CAMPOS

I, Lazaro Cardenas Campos, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 27 years old and I am from Cuba.

3. I am currently detained at Krome Service Processing Center in Miami, Florida. I have been detained here since April 4, 2020. I was transferred from Monroe County Detention Center when it closed.

4. I have one daughter in Cuba. I arrived in the U.S. in 2018 and applied for asylum, and I was granted parole and moved to live with my family in Miami, Florida. In December 2019, I was arrested for a charge that was dismissed, but was transferred to ICE custody. My deportation officer has now given me a bond of \$7,500, which I cannot afford.

5. I have asthma and take pills and an inhaler. Now that I am in Krome the staff have given me stronger pills, which give me bad side effects, like increasing my heart rate. I also have seizures, the last of which I had in December. This makes me very afraid of the coronavirus because I am vulnerable if I were to contract it. Here we are all worried about coronavirus.

6. I am currently sharing a room with 47 other people, with only one bathroom with three showers. They bring food to our room to eat together all together, and it seems we are under quarantine. We can only leave one hour a day to go to recreation. It has been like this since I arrived in Krome. I am with other men who have been transferred here from Monroe, along with other men who have recently been from other facilities. I think we are all under quarantine but they have not explained this. Even though we are in quarantine we interact with the

other detainees in recreation, where there are hundreds of people in the same space at once.

7. The whole day we are less than 6 feet away from each other because there is not space in our room. It is about 10-15 meters squared with about 48 people in the same room. They even add several cots to our space for us to all sleep together in the night.

8. I share the three showers with the 47 other men, and there are three urinals and only one toilet in the bathroom to use.

9. The men who are detained here prepare the food and do the cleaning. They sometimes use gloves but do not use masks while preparing the food or cleaning.

10. We have not been trained on how to limit the spread of coronavirus. The guards do not communicate with us about what is happening here. We only learn through the one television, which is in our room.

11. Sometimes the guards have masks, but many do not. The two guards who are currently watching our room do not wear masks, but only one is wearing gloves. I do not see the staff regularly washing their hands. The guards pat us down very frequently, whether we are going to go to the commissary or to recreation. During the day I am touched by a guard about four or five times. Sometimes the guards do not wear gloves.

12. I entered Krome less than one week ago and since then have seen new people brought in to the detention center.

13. We have not received any announcements or information about coronavirus in the facility.

14. Some of my roommates are sick, and one of the men in a bed near me had fever. He had to get so sick that the guards came in along with the federal police, armed with pistols with rubber bullets, in the middle of the night to take

him away. They did not explain what was happening. We are all very upset. The next night a new detainee was brought in to replace him in his bed. At least three other men in my room seem sick, and seem to have fevers. They have asked to see a doctor but have not been able to see one because there are so many people in Krome.

15. Although I am vulnerable if I contract COVID-19, I have not received any evaluation of my conditions to determine whether additional precautionary measures are necessary to protect me from the illness. I am afraid for my life.

16. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

17. If I am released from detention, I would live with my uncle, Ramon Herrera, in his house on 1119 SW 22nd Avenue, Miami, FL, where I previously lived. I have my own room there and could practice social distancing.

18. I have authorized Meredith Hoffman, a law student at the University of Miami School of Law, 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 10, 2020.

Meredith Hoffman

Meredith Hoffman on Behalf of Lazaro Cardenas Campos

CERTIFICATION

I, Meredith Hoffman, declare that I am proficient in the English and Spanish languages.

On April 10, 2020, I read the foregoing declaration to Lazaro Cardenas Campos, and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 10, 2020.

Meredith Hoffman

Meredith Hoffman

LAW STUDENT DECLARATION

I, Meredith Hoffman, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Meredith Hoffman. I am a law student in the University of Miami School of Law Immigration Clinic, where I am supervised by Professor Rebecca Sharpless, a licensed attorney in good standing in the state of Florida.

2. I interviewed the declarant, Lazaro Cardenas Campos, over the phone. Out of necessity in light of the COVID-19 pandemic, I signed Lazaro Cardenas Campos's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am unable to travel to visit Alejandro Ferreira Borges under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.
5. In light of the above, to protect public health, I am not able to travel to the Krome Service Processing Center in Miami, Florida, to obtain Lazaro Cardenas Campos's signature.

Meredith Hoffman

Meredith Hoffman

DECLARATION OF NAIM ARRAK

I, Naim Arrak, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am twenty-one years old. I am a national of Tunisia.

3. I am currently detained at the Krome Processing Center (“Krome”) in Miami, Florida. I have been detained here since September 12, 2019. I first came into the custody of Immigration and Customs Enforcement at the Caroline Detention Facility on July 2, 2019.

4. I was transferred to Krome due to mental health concerns.

5. My adoptive parents are United States citizens. They live in Virginia. I have four siblings who are also United States citizens. I am hoping to adjust status in immigration court and become a lawful permanent resident. I also am afraid to return to Tunisia and I am applying for withholding of removal.

6. I have major depressive disorder. I am currently taking psychiatric medication. I am housed in the Krome Behavioral Housing Unit or (“KBHU”) at Krome. I reside in the KBHU; there have been about fifteen of us in here the past few weeks. I have my own room to myself. However, I share a common area with everyone else. I interact with them when it is time for medication, during meals, and when I want to watch television and the news.

7. When I sleep, I am in my room by myself. Because I have depression, I try to avoid being in my room all day by myself. My doctor and therapists have told me to not do that. I try to use social distancing but I can’t tell people to get away from me and there is not a lot of space. People get hot and angry. I don’t want to get into an argument or get in trouble. I’m forced to be where I’m at.

Everywhere we go, there is always someone nearby.

8. Krome is not providing soap to us right now.

9. There is no hand sanitizer available.

10. They don't give us stuff to clean the phones with. I put a sock on the phone.

11. I have asked for wipes. Guards use the wipes for their chairs but they won't allow us to use them.

12. The past few days, the guards take us all outside for recreation. They say it is mandatory to go outside. They threaten to send us to the "hole," if we do not go. The "hole" is the Segregated Housing Unit. They want us to go in the morning and in the afternoon.

13. The guards do not give us anything to clean with. The people who are supposed to clean do not stay very long and they do not really clean the bathroom. There is fecal matter on the toilet. The showers smell bad.

14. With respect to the food, I feel scared to eat my food because of the virus.

15. I have requested face masks and gloves from the guards that work at Krome. I have never received any face masks or gloves. The guards have told me the face masks and gloves are only for guards. One guard told me that the masks are for the guards to protect themselves.

16. I am afraid that others in KBHU have the virus.

17. Honestly, this is becoming a mental health issue for me. When I sleep, I feel like I'm going home in a box. I am having so much negative thoughts. I am so stressed my hair is falling off. This is getting ridiculous. I am trying to stay positive and do all that I can.

18. I have seen guards walking around without face masks and gloves inside of my housing unit. On one occasion, I asked a guard to put on a face mask.

The guard told me it was uncomfortable and he didn't want to wear it. He told me the mask irritates him. The officers continue to pat us down even though they are not consistently wearing masks and gloves. I feel that I have to frequently ask officers to put on gloves before patting me down. I ask them to wear the gloves and face masks because I want to feel safe. I got into a situation recently where I asked two officers to put on gloves. He did not listen. I asked him to call the lieutenant. After that, he put a mask on later.

19. Guards have told me that three other guards have tested positive for COVID-19. Officer Lopez told me three guards named Goldberg, Roger, and Barton have tested positive. Barton works outside in the yard. Goldberg works everywhere in the facility but has in the KBHU the past week before April 7, 2020. Roger works usually in supplies, trash, and sometimes in the cafeteria. Goldberg's family member has COVID-19. Officer Lopez told me he did not understand why Goldberg came into work. Apart from Officer Lopez, Lieutenant Smith told me that Roger and Barton tested positive. Goldberg also told me about Roger and Barton testing positive. I had seen Goldberg without masks and gloves. Today, Officer Lopez is working in the KBHU lobby. He worked the day before yesterday as well.

20. I have interacted directly with Goldberg and Lopez while I have been in the KBHU. They have patted me down and they have served me food before.

21. Commander Chapula of KBHU came and talked to us. I asked if there was a way to know which officers have COVID-19 and he said they could not tell us due to HIPAA. I asked about face masks and he said they could not provide us with face masks because they're for officers. I said it was not right for them to not giving us masks. He said if we did not like it, we could go to general population. I asked for wipes and cleaning supplies and he said we couldn't because we are in the mental health unit.

22. I feel trapped in here.

23. Commissary is closed. I don't know how I will get more soap.

24. I do not believe that guards are regularly washing their hands. I actually think it is impossible because they have to call an escort every time they go to the bathroom.

25. As far as I can tell, the only sanitizer that exists is for the nurses.

26. The guards do three shake downs every day. This means they go through my clothes and papers and they touch everything, in every room. This happens on three different shifts with three different people. Because of this, I feel like it is literally impossible to stay protected from the virus.

27. When we are in pill line, I have seen new people coming in with bags. I have asked officers about new people and guards have confirmed new people are still being brought in. I have heard that there are detainees coming in from other places. This makes no sense to me. I don't understand why they would bring in new people.

28. Even though KBHU is separate, the KBHU guards go to other pods and come back to KBHU and hang out with each other in the lounge or eat together. There is no way officers stay six feet away from each other either.

29. The KBHU previously shared meals with Pod 1. We ate breakfast and dinner in our unit but we had lunch with Pod 1. This stopped around the week of March 30, 2020. Later, all meals were considered "satellite" style and the AGS guards began to bring all of our meals to the KBHU. This remains true today.

30. I have heard from officers that a lot of people are sick in Building 11. Officer Lopez told me there was a huge protest there.

31. ICE escorted a Mexican man named Jose Montalvo who was detained in the KBHU to a hospital. A guard told me he has tested positive for COVID-19.

32. If I am released from detention, I will comply with any applicable

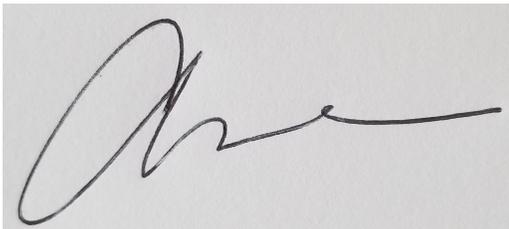
conditions of release including attending check-ins and immigration court hearings.

33. My parents are United States citizens. They have a home in Virginia. I will live with them if I am released. They have a four-bedroom house and a basement. I will practice social distancing and appropriate isolating behavior if I am released from ICE custody.

34. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 10, 2020.

A handwritten signature in black ink, appearing to read 'Andrea Crumrine', is written on a light gray background. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Andrea Crumrine, on behalf of Naim Arrak

ATTORNEY DECLARATION

I, Andrea Crumrine, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

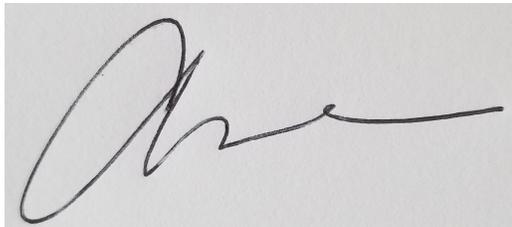
1. My name is Andrea Crumrine. I am a licensed attorney in good standing in the state of Minnesota
2. I represent the declarant, Naim Arrak, in his immigration case at the Arlington, Virginia Immigration Court. Out of necessity in light of the COVID-19 pandemic, I signed Mr. Arrak's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County,

Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Mr. Arrak via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Mr. Arrak has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Miami, Florida.

A handwritten signature in black ink, appearing to read 'Andrea Crumrine', is written over a light gray rectangular background.

Andrea Crumrine, on behalf of Naim Arrak
Attorney for Naim Arrak

DECLARATION OF HASSAN M. FARAH

I, Hassan Mohamed Farah, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I was born in 1980 in Mogadishu, Somalia. I am 40 years old.

3. I am currently detained at Krome Detention Center in Miami, Florida. I have been detained by ICE since October 16, 2017.

4. I am married to a U.S. citizen spouse and I have 9 U.S. citizen children. My oldest son is a Marine.

5. I developed diabetes, kidney stones, a hernia, high cholesterol and high blood pressure while in immigration detention. I was previously diagnosed with PTSD due to childhood trauma that occurred during the Somali Civil War, and I am prescribed the highest possible adult-dose of Remeron to alleviate the symptoms of PTSD.

6. I am currently housed in the KBHU (Krome Behavioral Health Unit). There have been at least 15 other detainees in the unit with me over the past few weeks. Most of us sleep two to a room. The rooms are very small and our beds are less than an arms length apart. I cannot keep 6 feet from my roommate. There is no air circulation in the rooms to bring in fresh air from outside. We are breathing everyone else's air. It is not possible to stay 6 feet away from other detainees or guards.

7. There was a detainee in our unit about 2 weeks ago who is now in the hospital. His name is Jose. While he was in our unit, he was coughing and sneezing and appeared to be sick. We were told he got it from someone else during our rec time. We were all exposed to him and to the same people he was exposed to.

8. Over the past couple of weeks, 3 newly arrested detainees were put into our unit. One was a Haitian who was coughing and sneezing. He left because he was deported to Haiti. We were all exposed to him.

9. We have no hand sanitizer in our unit. We were told they ran out over a week ago. The only hand sanitizer I have been able to get is one squirt when I go to pick up my medicine. I am only allowed that one time a day.

10. The guards bring our meals into the unit, but we cannot eat where we sleep. Instead, we have to eat in the day room in our unit. The day room is a small room with two tables and a few chairs at each table. We have to eat right next to each other. It is not possible to keep 6 feet away. We used to eat in the cafeteria, but they closed it. Before they closed the cafeteria, we used to eat there with pod 1, which has sick people and is now on lockdown. We have heard that detainees are still working in the kitchen, preparing food. We don't know if they're wearing masks or gloves.

11. We have no gloves or masks. We are told that we are not allowed to have any, because they don't even have enough for the guards. Some of the guards are making their own masks out of cloth.

12. The guards only started wearing gloves and masks a few days ago, when pod 1 was locked down. Even now, about half of the guards choose not to wear a mask or gloves. Many guards are taking their gloves or mask off, and only put it back on when they see their boss coming around.

13. The guards come into our unit all the time to check doors and check our rooms. They go through our personal items, touch door handles, and sit in our chairs.

14. Whenever the guards take us out of the unit, they search us. They pat us down, and are very close to us. This happens about 8 times each day. Many times they are not wearing gloves or masks when they do this. Some guards say

it's easier to do without the gloves so they take their gloves off to pat us down.

15. Whenever the guards take us out of the unit, they are close to us and they require us to stand close to one another. If we try to keep more space between us, they will get angry.

16. We have heard many guards angry and complaining about their working conditions. They are angry that they are being forced to do more and longer shifts. They are being required to do this because several guards have been sent home sick, and others are calling in sick. We heard from the guards of riots in two other pods.

17. Last night, the guard who brought us our food was angry. He took his gloves and mask off in anger when he was serving us our food. We had no choice but to accept the food he served us. We complained to his boss, Lt. Smith. Lt. Smith said that he didn't see the guard without his gloves or masks on, so we asked him to check the camera recordings. Another guard who previously served us food without gloves was sent home sick.

18. We used to be allowed to clean our own unit with cleaning wipes, but the wipes ran out over a week ago, and they have not brought us any more cleaning wipes. The tables and chairs where we eat have not been cleaned properly in over a week. The only thing we can do is to wipe them off with toilet paper. But there is not enough toilet paper to use in the bathroom, so sometimes we can't even do that.

19. There is a bathroom in our unit with 3 toilets and urinals and 4 sinks, and a separate section with 6 showers. The bathroom is small. The toilets have no doors. The sinks and toilets are close to each other. The shower area is a very small open area and the shower heads are very close to each other with nothing separating them. If 6 men are in the shower at the same time, it is impossible not to accidentally bump into each other. The cleaning people come in for a few minutes to mop the bathroom floor, but they don't clean anything else in the bathroom or

any other room.

20. The soap in the bathroom ran out. There is only some type of lotion, but it doesn't clean our hands. We used to be able to buy a bar of soap for \$3-4/bar from the canteen, but they closed the canteen. If you want to buy something now, you have to put in a request to order it, but it can take 2-4 days or more.

21. Rec time is mandatory. We cannot choose not to participate. The guards take us to the small outdoor rec area all 18 at a time, and they bring in another unit as well. There are 3-4 guards supervising. It is not possible to maintain 6 feet, or even 3 feet distance from all other detainees and guards.

22. The medical staff at Krome is short-staffed. From what I can tell, they have not hired any new medical staff.

23. I have not been receiving proper medical care in detention. All of my medical conditions - diabetes, kidney stones, a hernia, high cholesterol and high blood pressure – developed since I have been in immigration detention. I never had any of these conditions before being in ICE custody. I am receiving medicine for diabetes, but my blood sugar is not being regularly monitored. I need regular tests to monitor my blood sugar, so that when my blood sugar is high, I can get insulin, and when it is low, I can receive a snack to bring it up. But I have not been tested more than once a month at Krome, and only when I demand it. As a result, I am getting severe headaches and swollen and numb feet. I have gained weight and my skin is itchy.

24. The hernia that I developed in detention is incredibly painful. It gets very big in the morning. It is so painful that I cannot sit down, I can only lie down on my bed. The only treatment I receive for it is a hernia belt, which is too tight. Last year I was told that I would not be given surgery for it because it would go away on its own. More than 6 months later, it still has not gone away, but has only gotten worse.

25. Last week, I received a blood test. I had requested it several weeks before. While waiting for my test, I was put in the sick call room with 8-9 new detainees who were visibly sick. I was waiting to speak to the doctor for 2 hours. I was very scared and had to use my jacket to cover my face. When I spoke to the doctor, he was not wearing a mask or gloves, and was coughing and sneezing.

26. I'm very afraid to be here. I'm afraid of dying here without my family. All I can do is pray. I speak to my wife and children every day. My wife is a personal care assistant for seniors, and she just came down with a headache and fever today. My youngest daughter is immunocompromised and just had major surgery last month. So, my wife is afraid to be around her because my daughter can die if she gets sick. I have been praying for my wife and children all the time. I pray to be able to go home to them to help keep them safe and in isolation.

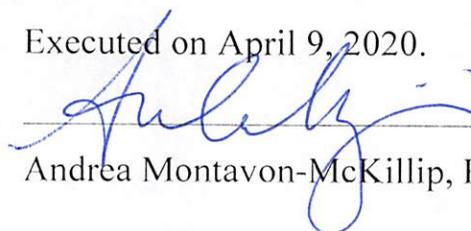
27. If I am released from detention, I will live with my wife and 8 children at 933 48th Ave. NW, Rochester, Minnesota 55901. I will keep myself and my children at home and follow the Minnesota stay-at-home order.

28. If I am released from detention, I will comply with any applicable conditions of release including ankle bracelet monitoring, attending check-ins, or any other type of supervision.

29. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.

 for Hassan M. Farah

Andrea Montavon-McKillip, Esq., signing on behalf of Hassan M. Farah

ATTORNEY DECLARATION

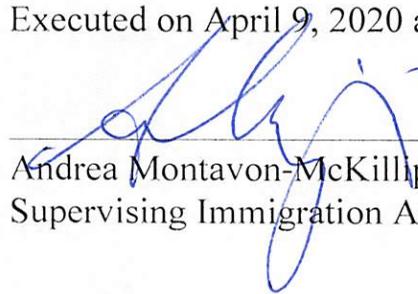
I, Andrea Montavon-McKillip, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Andrea Montavon-McKillip. I am a licensed attorney in good standing in the state of Florida. I am an inactive attorney in good standing in the state of Illinois. I am the Supervising Attorney of the Immigration Unit of Legal Aid Service of Broward County in Plantation, Florida.
2. I represent the declarant, Hassan Mohamed Farah, in his pending Petition for Review before the Eleventh Circuit Court of Appeals and previously in removal proceedings before the Krome Immigration Court in Miami, Florida and the Board of Immigration Appeals. Out of necessity in light of the COVID-19 pandemic, I signed Mr. Farah's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposable vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.

4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Broward County, Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.
5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Mr. Farah via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Mr. Farah has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Plantation, Florida.



Andrea Montavon-McKillip, on behalf of Hassan M. Farah
Supervising Immigration Attorney, Legal Aid Service of Broward County

DECLARATION OF AGANE WARSAME

I, Agane Warsame, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am forty-years-old. I am a national of Somalia.

3. I am currently detained at the Krome Processing Center (“Krome”) in Miami, Florida. I have been detained in Immigration and Customs Enforcement custody since August 1, 2017. I have been detained at Krome since October 26, 2019.

4. My wife, Michelle Warsame, is a United States citizen. She resides in Hutchinson, Minnesota. The Immigration Judge denied my request for withholding of removal and protection under the Convention Against Torture after the Board of Immigration Appeals granted my motion to reopen. I am currently appealing the decision of the Immigration Judge right now.

5. I have mental health problems. I am currently taking psychiatric medication. I also deal with depression and anxiety. I have a history of hearing voices.

6. I was a habitual smoker before I was in ICE custody. I would smoke a pack of cigarettes each day. I started smoking in 1999.

7. I am housed in the Krome Behavioral Housing Unit or (“KBHU”).

8. The KBHU includes two units: A unit and B unit. B unit can hold twenty-two people. A unit can hold eight people. In unit B, there are eleven rooms total; two beds in each room. There are four sinks; three urinals; and three toilets in B unit. In the middle of B unit, there is an officer desk. We also have a dayroom. B unit in total is probably forty or fifty feet wide.

9. I share a room with one other man. I can touch him when I reach my arm out if he also extends his arm and we are laying on our beds. Our beds are side by side.

10. I am within six feet of another person at all times of day in the KBHU.

11. All of our meals are in the dayroom. In the dayroom, there are two tables with chairs. There are two phones. I have not seen anybody clean or sanitize the phones or the tables. There is one television and a visitation area for use of an electronic tablet. There are nine tablets. I have never seen anyone clean or sanitize them either.

12. We eat all of our meals together at the same time in the dayroom. There are not enough tables and chairs for everyone so some people eat on the floor. Some people eat on their laps and others eat off of the chairs. Yesterday, I had to eat on the floor.

13. Apart from meals, we also play cards and socialize in the dayroom.

14. We are constantly in contact with each other.

15. Krome counts everyone in the facility at 8:30 in the evening. I stay in my room after that. Some guys stay out until later in the dayroom.

16. On April 9, 2020, we had a Community Meeting with unit A and unit B. We talked about our concerns. We mostly discussed the bathrooms and soap.

17. Krome has not provided soap for the last three days. I think the last time I saw soap provided by Krome was in the middle of last week. I have to buy my own soap using my commissary money. I am able to do so because of the support of my wife. I have heard of a least two people who does not shower because there is no soap. I try to shower every day. All soap I use is soap I purchased with commissary money from my wife. Some people go without soap because they do not have the money for it.

18. I carry my own soap with me. Canteen is closed right now. I heard

someone ordered shampoo over a week ago on one of the electronic tablets and he still has not received it. I currently have perhaps three days of soap left. I ordered soap two days ago and I am still waiting. I order my soap on one of the tablets. Soap costs \$3.85.

19. I have never had hand sanitizer. In the past, I have begged the nurses for hand sanitizer when I receive my medication and they sometimes will give me some.

20. I see nurses twice a day. I see nurses in the morning and at night when I am getting my medication. I go up to the window and the nurse slides medication to me through a little hole. Another nurse with a flashlight, two feet away, will check if I swallow my medication. The nurse with the flashlight was wearing a mask today. The nurse dispensing medication was not wearing a mask. Neither nurse was wearing gloves.

21. AGS guards bring food in a cart to the unit for all meals. Typically three guards come. The guards do not wear masks, some do not wear gloves. We ask them to wear gloves and masks. We are scared.

22. When we tell the guards to put on gloves, they laugh at us. They look like it is not a big deal. They say they wouldn't come to work if they were sick.

23. We do not get any spray for the tables to clean. After meals, we use toilet paper to clean the tables. I use toilet paper and napkins to clean my room.

24. There are ants all over Unit B. The ants keep coming into the room all day. Every time I set something down, ants come in. There are flies and ants in the bathroom.

25. I asked the KBHU Commander for a face mask. He denied me a face mask and told me he can assure me they have taken all precautions to keep us safe. He said taking our temperature is keeping us safe. When he told me that, I felt scared. I don't want to spend three years in this and come out dead. I am in

disarray. I am scared. There is nothing I can do to help myself because I am in this place. It is really difficult.

26. They have not confined us to our rooms at all. Staff are still coming in and detainees are moving around; there is no way to stay six feet away.

27. I made a facemask for myself out of two socks. I used a comb to put it together. My roommate helped me. I tied the two socks on one end and used the teeth of the comb keep the other ends together. I wear my facemask anytime I come out of my room. The only time I do not wear it is when I am on the phone.

28. I do not think the guards are washing their hands regularly because they have to leave the unit and go to the lobby to use the bathroom and I don't see them doing this. They're with us eight hours at a time.

29. AGS guards touch us anytime we leave, or go to recreation, or search our rooms. They pat us down several times a day. They do shakedowns of our bedrooms as well three times per day. Some wear gloves and some do not. Some tell me not to worry about it and that they do not have anything.

30. I think they're waiting for bodies to start dropping in Krome before they take this situation seriously, and I am not trying to be that person.

31. I had a long lapse in medication after I was transferred from Baker County Jail. I waited for a long time to see a psychiatrist at Krome. I think I waited about a month or a month and a half before I saw a psychiatrist. I was completely without medication during that time. I have heard from people in general population that detainees will only receive medical attention if it is an emergency. You have to be dying or they just do not care.

32. At Krome, every building and every unit is separate. At the same time, the staff is free to move and roam around. One officer in KBHU can go into any one of the other buildings. I think the guards can easily transmit the virus. They come here, talk to me, pat me down, hand me tablets, give me all these

things, like food, and search my room. The danger is still here. They also deal with new people coming into the facility. Building 11 is shut down right now. They had a big protest earlier this week because of guards not wearing protective gear. They have had enough in building 11. Pod 1 in building 8 is also on lockdown.

33. Yesterday, five AGS guards were sent home. There were some guards who worked double shifts to make up for it. I heard they sent more AGS guards home two days ago.

34. There are six detainees that we know about who have tested positive at Krome. Jose Montalvo is in the hospital upstairs in Larkin Hospital and he used to be in the KBHU. He is quarantined in the hospital. We don't know anything. I used to sit with this man.

35. I feel terrified. I am looking for signs and I feel paranoid about everyone and everything. I am fully aware of other people and myself. I am paying attention to things I never paid attention to before. I am scared of guards touching me. I am afraid of getting close to people.

36. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins.

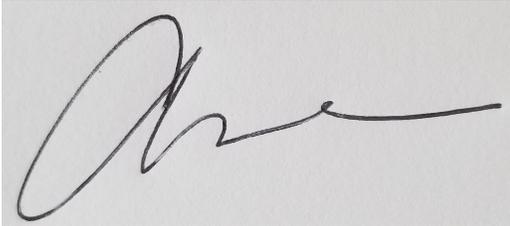
37. If I am released from detention, I will live with my wife, Mrs. Michelle Warsame. She is a United States citizen. She currently lives in Hutchinson, Minnesota. I will practice safe distancing. I talk to my wife on a daily basis. She is still working. We have a house up there and I will live with her.

38. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true

and correct.

Executed on April 9, 2020.

A handwritten signature in black ink, appearing to read 'Andrea', is shown within a rectangular frame. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Andrea Crumrine, on behalf of Agane Mohamed Warsame

ATTORNEY DECLARATION

I, Andrea Crumrine, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

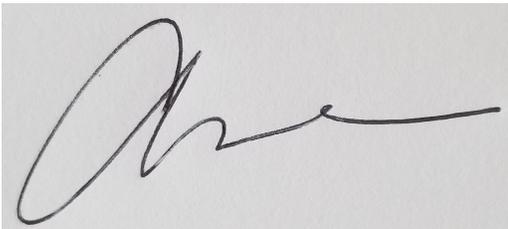
1. My name is Andrea Crumrine. I am a licensed attorney in good standing in the state of Minnesota
2. I represent the declarant, Agane Mohamed Warsame, in his immigration case at the Krome Immigration Court and the Board of Immigration Appeals. Out of necessity in light of the COVID-19 pandemic, I signed his declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County,

Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Mr. Warsame via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Mr. Warsame has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10, 2020 in Miami, Florida.

A handwritten signature in black ink on a light gray background. The signature is cursive and appears to read 'Andrea Crumrine'.

Andrea Crumrine, on behalf of Agane Mohamed Warsame
Attorney

DECLARATION OF MOHAMED HASAN

I, Mohamed Hasan, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am twenty-eight years old. I am from Somalia.

3. I am currently detained at Krome Processing Center. I have been in the custody of ICE since August of 2017.

4. The Immigration Judge granted my case for deferral under the Convention Against Torture, however, the attorney who represents ICE is appealing the decision.

5. I have post-traumatic stress disorder and major depressive disorder. For medication, I take medication in the morning for my depression and medication at night for my PTSD to help me sleep.

6. My current living situation is I am in the KBHU in the A Unit. I do not have a roommate. My roommate left three days ago because he was feeling depressed. He moved to B Unit. There are only five people in my side right now, including myself. A Unit only holds eight people.

7. I sit right next to people during all three meals. The area is very small. There are two tables right next to each other; there is no other place for me to eat.

8. If I am not in my room, I am in close contact with everyone.

9. I am thinking about going into confinement or disciplinary housing to try to avoid people and getting the virus. I will be social distancing if I am in confinement. I will be alone by myself. I am worried my mental illness will get worse. I am afraid because there is no telling how long this will all last. I do not know if it is a good thing to do right now.

10. I know I am going to get the virus if I stay here. There is a guard around who is coughing inside the KBHU. I only know his first name is Dell. I try to avoid him as much as I can. When I complain, they tell me it is not up to them and that I can put my concerns in a grievance. The grievance system is not useful. I have tried in the past to file grievances and nothing has happened. A while ago, I filed a grievance because the meals we were served were past their expiration date, according to the labeling. ICE responded and said the dietitian said nothing was wrong with the food and they were following the recommendations of the dietitian. Nothing was resolved. Now, the grievance system is not worth it to me.

11. Krome has not brought any soap. I currently have a small bar of soap that another detainee bought and gave to me. That person is in the other unit of KBHU now. The last time I used soap provided by Krome was about two weeks ago. I am being very careful with my bar of soap. I cherish my soap because I know once my soap is gone, I won't have anymore soap. I am not taking proper showers that I need because I know if I were to take a proper shower, my soap will be gone.

12. I only use my soap when I shower. I am not washing my hands with my soap because I have decided to use my soap only for showering. I rinse my hands with water only.

13. Soap is about \$4.00 but I am not sure. The only way to get soap now is through the commissary. I do not have any commissary money right now.

14. I am not allowed to use hand sanitizer. The guards told me it is not for us. They're treating it like it is gold. The nurses will sometimes spray it on my hand but it depends on the nurse. This is only when I am getting medication and it is very rare.

15. A maintenance person comes but they do not properly clean the place. They do not use any bleach. I worry I will throw up when I go into the bathroom

because of the bad odor.

16. I have had to clean the bathroom myself.

17. I used my towel that I use to shower with to clean the bathroom by ripping a part of my towel off. I use it as a rag. I had no choice. They will not provide us with rags. I still use what is left of my towel to dry off.

18. I use this part of my towel to clean my room where I sleep. I wipe down the windows with it.

19. I have never worn gloves or a face mask.

20. I asked for a face mask and they told me it will not happen. I asked and they told me they did not have to explain themselves to me.

21. I see guards are really scared. Five officers got escorted out the other day because they were showing symptoms. They were coughing. They were told to go home. I do not know if they were tested.

22. I do not know if guards are washing their hands.

23. The guards touch me to pat me down whenever I move rooms. Guards do not change their gloves when they pat down multiple detainees at the same time.

24. The guards will touch everything in our rooms when they do shakedown, like our blankets and books. The last time they did a shakedown of my room, they were wearing gloves but no masks.

25. I saw new people coming into Krome today. I could tell they were new because they have net bags, new blankets, and new materials detainees receive when they are processed into the compound. There were a bunch of them today.

26. The Krome guards have told us to wash our hands and to stay away from each other. I have not heard of any other instructions or guidance.

27. There are sick people in building eleven and building fourteen. It sounds like there are a lot of people who are very sick. A guard and nurses told me

this.

28. There seems to be a shortage of guards and nurses. Guards are working overtime and saying that nobody wants to come in to work.

29. Guards have told me that ICE is not prepared for this and they do not know how to handle this situation. I remember a guard told me that ICE has never had a situation like this before and that they think ICE is confused.

30. We are required to go to recreation in the yard twice a day for one hour. I do not know why they are doing this. We argued about it because it is impossible to stay away from people because the area is so small. I try to stay by myself in a corner.

31. I asked about the phones in KBHU. They are not being cleaned, wiped down, or sanitized. The guards say it is out of their control. They have told me that if I have a problem, I should put a grievance in.

32. Today, people in my unit were supposed to speak to an ICE Deportation Officer. Usually he comes to the actual unit, today he visited over the phone for the first time. This means to me that they know this virus is uncontrollable. They're choosing to not be around us because they know it is in here.

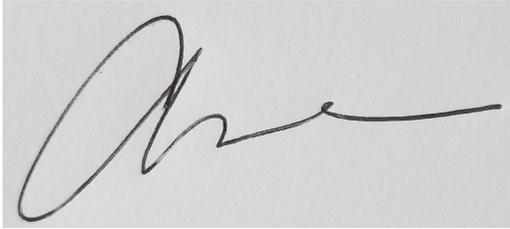
33. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

34. I will live with my sister in Ohio. Her name is Amina Mohamed. She is a United States citizen. I will practice social distancing if I am released.

35. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 10, 2020.

A handwritten signature in black ink on a light gray background. The signature is cursive and appears to read 'Andrea Crumrine'.

Andrea Crumrine, on behalf of Mohamed Hasan

ATTORNEY DECLARATION

I, Andrea Crumrine, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

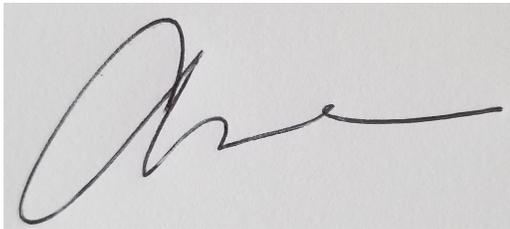
1. My name is Andrea Crumrine. I am a licensed attorney in good standing in the state of Minnesota.
2. I represent the declarant, Mohamed Hasan, in his immigration case in the Krome Immigration Court in Miami, Florida and the Board of Immigration Appeals. Out of necessity in light of the COVID-19 pandemic, I signed Mr. Hasan's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County,

Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Processing Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Mr. Hasan via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Mr. Hasan has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10, 2020 at Miami, Florida.

A handwritten signature in black ink, appearing to read 'Andrea Crumrine', is written on a light-colored background. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Andrea Crumrine, on behalf of Mohamed Hasan
Attorney

DECLARATION OF TOLENTINO MARTINEZ-RIOS

I, Tolentino Martinez, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 50 years old, and I am from Mexico.

3. I am currently detained at Krome Detention Center in Miami, Florida. I have been detained here since or around March 5, 2020.

4. My bond hearing was scheduled for April 1, 2020 but was canceled due to the COVID-19 pandemic.

5. I am seeking Withholding of Removal, and protection under the Convention Against Torture, due to fears returning to Mexico. I would be returning to a small village in Oaxaca. I fear being persecuted on account of my race as an indigenous person of Zapoteco descent and being a member of a particular social group. I have 3 kids.

6. After the COVID-19 Pandemic was announced all inmates in the detention center were worried due to the way we lived in our cells and daily routines and the fact officers are going outside the detention center in addition to the new inmates arriving every day who may carry the virus.

7. Although I currently do not suffer from any chronic disease the COVID-19 symptoms and evolution of the illness could affect anyone whether they are healthy or not and giving the conditions I live in Krome, I consider that I may be more vulnerable to it, especially since there is a rumor that the inmate that was taken out last week had the virus.

8. The detention center is set up so that detainees are close to each other when we eat. It is impossible for us to practice social distancing of at least 6 feet.

9. This we my cellmates and I were placed into quarantine by not letting us out of our cell. There are around 100 of us in a big space where we sleep about 3 ft apart from each other.

10. My friend Meyling Rios has deposited money to my account and with this money I have been able to buy personal hygiene products since these are not provided by the facility.

11. I have seen new detainees coming into the detention center at least until one week ago.

12. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

13. If released, I would live with Meyling Osorio, where I used to live prior to my detention. My room is separate from the rest of the members of the household and I would be able practice social distancing and self-isolation.

14. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 8, 2020.



[Laura Kelley, on behalf of Tolentino Martinez-Rios]

CERTIFICATION

I, Daniela Tulande, declare that I am proficient in the English and Spanish languages.

On April 9th, 2020, I read the foregoing declaration to Tolentino Martinez-Rios and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 9th, 2020.

Daniela Tulande

Daniela Tulande

ATTORNEY DECLARATION

I, Laura Kelley, declare the following under penalty of perjury pursuant to 28 U.S.C.

§ 1746:

1. My name is Laura Kelley. I am a licensed attorney in good standing in the states of Florida and California.
2. I represent the declarant, Tolentino Martinez-Rios, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Tolentino Martinez-Rios' declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County,

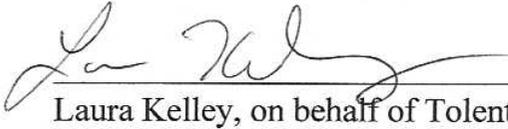
Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.

6. ^{my staff and I JK} I spoke with Tolentino Martinez-Rios via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Tolentino Martinez-Rios has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 8, 2020 at Miami, Florida.



Laura Kelley, on behalf of Tolentino Martinez-Rios

DECLARATION OF FERMIN TEPETATE-MARTINEZ

I, Fermin Tepetate-Martinez, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 26 years old, and I am from Mexico.

3. I am currently detained at Krome Service Processing Center in Miami, Florida. I have been detained here since around March 21, 2020.

4. I have a USC fiancé who I intend to marry once I am released. We requested our marriage license before my detention, but we have been unable to get married due to my detention. I previously attempted to file for Asylum, Withholding of Removal, and protection under the Convention Against Torture, due to persecution I experienced in Mexico.

5. I am very worried about the coronavirus situation.

6. I sleep in the same cell with three other individuals less than four feet away from each other.

7. There are times when it is impossible to stay 6+feet apart from other people. When we eat, we are all together at a distance of less than one meter. When we're in recreation we are all together.

8. Soap and/or hand sanitizer are not available. There used to be liquid soap but not anymore. We wash our hands with water because there is no hand soap or hand sanitizer available. The only soap available is during our shower.

9. I am able to bathe every day but I cannot wash my hands throughout the day.

10. Detainees cook the food. There may be 2 employees, but mostly

detained aliens cook the food. Cleaning is mostly done by detainees. I don't know if the cleaners and cooks wear protective gear because at this time the food is taken to my cell. Before this they used gloves only, no masks or other protective gear. ICE has been taking food to my cell for the last week. Before that, I saw detainees cooking and cleaning with only gloves, no other protection.

11. I have been informed about social distancing but it is difficult to accomplish.

12. I could buy soap at the commissary, but I would have to order it. I have not bought any soap at the time.

13. Guards/staff/ICE officials started to use masks. Sometimes they use gloves, but not always. The guards wash their hands with water because there is no soap to wash hands.

14. Guards touch detainees. They touch us to wake us up, or when we're having breakfast or lunch, or when we're out in the yard. Guards might touch our arm or our hand. They do this when they do count, or when they search us when they go out to the yard. We are searched to make sure we don't have contraband.

15. Over the last few weeks ICE has brought new detainees to Krome.

16. I heard that two cells were quarantined, but I have no direct knowledge of this incident. I also know that someone had a cold but I have no direct knowledge of the incident.

17. I have not been scanned, tested or evaluated by a doctor for covid19.

18. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

19. If released, I would live with my fiancé and her family at 1275 Druid Rd Clearwater Florida, 33756. There is a room available for me to practice social distancing and self-quarantine.

20. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.



Laura F. Kelley, on behalf of Fermin Tepetate-Martinez.

CERTIFICATION

I, Lorraine Chilson, declare that I am proficient in the English and Spanish languages.

On April 9, 2020, I read the foregoing declaration to Fermin Tepetate-Martinez and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 9, 2020.

Lorraine Chilson

Lorraine Chilson

ATTORNEY DECLARATION

I, Laura F. Kelley, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

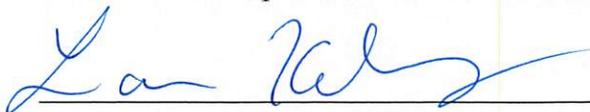
1. My name is Laura F. Kelley. I am a licensed attorney in good standing in the state of Florida. I am an inactive attorney in good standing in the state of California.
2. I represent the declarant, Fermin Tepetate-Martinez, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Mr. Tepetate's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County,

Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.
6. My staff and I spoke with Fermin Tepetate-Martinez via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Fermin Tepetate-Martinez has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Miami, Florida.



Laura F. Kelley, on behalf of Fermin Tepetate-Martinez

DECLARATION OF RUBEN ORLANDO FLORES RAMOS

I, Ruben Orlando Flores Ramos, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am a 40 year old man, originally from Honduras.

3. I am currently detained at Krome in Miami, Florida. I have been detained here since March 25, 2020. Before being transferred to Krome, I was detained at Wakulla County Detention Center in Crawfordville, Florida, from March 9 to March 25, 2020.

4. I am the father of four children and committed to my longtime partner, all of whom live in New Orleans, Louisiana. Two of my children are United States Citizens. I hope to be reunited with them so that I can pursue immigration relief.

5. I am in the process of seeking U Nonimmigrant Status. I have been the victim of two crimes—first in New Orleans, a man threatened to kill me and my pregnant partner at gunpoint, and I helped the police investigate this crime. I'm currently assisting the Department of Labor in an investigation where an employer held me at gunpoint and threatened my life when I attempted to seek backwages. An investigator from the Department of Labor interviewed me on March 12, 2020 while I was detained at Wakulla, and I hope to continue working with them to seek justice.

6. I also have asked for reconsideration of a reasonable fear redetermination from the Miami Asylum Office. As a Garifuna man, I fled to the U.S. because members of the powerful transnational Mara Salvatrucha threatened to kill me, just as they recently killed my Garifuna close friend who was threatened

alongside me. My attorneys sent my request to the Miami Asylum Office on March 27, 2020. I do not know the status of this request. I got a notice that is in English, which I cannot read, and my attorneys have not received any response to the request.

7. I have hypertension/high blood pressure. Both times that I have seen a nurse or health worker in Krome Detention Center, they took my blood pressure and told me that it was very high. I do not know exactly how high. Then they gave me three pills that I have taken twice. They told me that these pills were for my high blood pressure. I do not know what might be wrong with my heart and blood pressure but I was scared to hear this and to be given so much medicine.

8. I am very worried about getting COVID 19, because I understand it may be worse for people with high blood pressure and my age.

9. Truthfully ever since I was first detained, my health has been deteriorating. Since I was first held in Wakulla and continuing to now at Krome, I have had terrible problems sleeping. The memories of being held at gunpoint wake me up at night so I cannot rest. I feel weak all the time and tired too. I cannot eat very much because I feel sick.

10. When I was at Wakulla, a nurse checked me on March 23, two days before I was transferred here. The nurse told me that I was not breathing normally and that my breathing was labored. That made me very scared because of the coronavirus news that I had heard about.

11. I did not want to be transferred to Krome. My legal representatives had told me that they had talked to my deportation officer, Officer Buxman, on March 18 and that he had said that all transfers between facilities were cancelled for at least a week. I thought that meant that ICE was taking the outbreak seriously. But then I was told that I would be transferred to Krome before even that week was up. After I reported to my legal representatives that a health worker told me there

was a problem with my breathing, they called my deportation officer on March 24, 2020 and asked if I could be released due to my increased health risk due to COVID 19 and my difficulty breathing. They told me that he said it was safest to keep me in detention, where I would not get exposed to the virus.

12. I am not safe here and I believe I have been exposed to the virus here at Krome. On April 2, 2020, in Krome someone who was here with me at 14 Bravo got sick. The guards checked on him 3-4 times and at the end they took him out of the unit. Ever since, our entire unit at 14 Bravo has been in quarantine.

13. Conditions here are incredibly dangerous and we are in very close contact with each other all the time. We are not in small individual cells. There are at least 100 of us in one big room all together. The bunks with our beds are very close to each other and only about 3 or 4 feet apart. Everything on the news says to stay apart from each other but that is impossible living the way that we are. We also are not being given information about how to protect our health here and it is impossible to follow the advice that we hear on the news in this environment.

14. I have heard at least 9 of the guards have gotten sick here. The guards are coming in and out all the time. Some of them wear masks over their faces but others do not. They are around us all the time and they touch us, counting us. Any one of them could infect dozens of us from what I understand about the spread of the virus.

15. There are not enough showers for us to clean regularly. There are only 12 for 100 people so if you want to take a shower you have to wait in line. There are only 10 sinks to wash your hands.

16. I am especially afraid for my health because of the medical care. I have felt sick ever since I have been in detention but I have never seen a doctor. I was in Wakulla for weeks and they did nothing to help me even though I got sicker and sicker and could not sleep. Then they transferred me even when a nurse

noticed my trouble breathing.

17. I am really worried about my high blood pressure and exposure to the virus. But now they tell me that I cannot go see the doctor because I am in quarantine.

18. I saw a nurse when I first got here and then they gave me three pills. I took 5 mg hydrochlorothiazide, 20 mg of lisinopril, and 5 mg amlodipine. I saw a nurse one other time, around April 9, and then they gave me the three pills again. But neither time did they evaluate my conditions and vulnerability to coronavirus to determine if any additional measures are needed to protect me from contracting the disease.

19. There is no way to get tested for the virus here. They have thermometers and sometimes take our temperature. But I heard on the news that you can have the virus even if you do not have a fever.

20. People have started complaining here because we are all afraid that we will get the virus and die. On April 7 in the early evening I woke up to hear people raising their concerns about conditions here and fears of the virus. But then I watched as the guards started beating those people. One of officers, I think his name was Officer Garcia, kicked me even though I was not with the group of people complaining. I think that my ribs are broken and I am still in pain from this. There was a ton of blood and violence. They only just cleaned the blood of the floor today. I desperately want to get out of this dangerous environment.

21. Additionally, I have watched as others here in 14 Bravo can no longer call the attorneys that are working on their cases. This happened after people complained about the virus so I think it was in retaliation from the guards. I can still call my attorney right now but I am afraid of what would happen to me if I lose contact.

22. If I am released from detention, I will comply with any applicable

conditions of release including attending check-ins and immigration court hearings.

23. If I am released, I would go home to my family in New Orleans, Louisiana. I live there with my partner and my children. There I could take care of myself and separate myself from other people.

24. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 10, 2020.

Mary Yanik

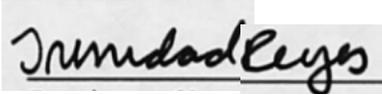
CERTIFICATION

I, Trinidad Reyes, declare that I am proficient in the English and Spanish languages.

On April 10, 2020, I read the foregoing declaration to Ruben Flores Ramos and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 10, 2020.

A handwritten signature in black ink that reads "Trinidad Reyes". The signature is written in a cursive style and is placed on a light gray rectangular background.

Trinidad Reyes

ATTORNEY DECLARATION

I, Mary Yanik, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Mary Yanik. I am a licensed attorney in good standing in the state of Louisiana, as well as in the state of New York.
2. I represent the declarant, Ruben Orlando Flores Ramos, in his immigration case, including his U Nonimmigrant Status application preparation and the request for reconsideration of a reasonable fear redetermination before the Miami Asylum Office. Out of necessity in light of the COVID-19 pandemic, I signed Ruben Orlando Flores Ramos's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are

prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.

4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of New Orleans, Louisiana and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Louisiana John Belle Edwards on March 22, 2020, in addition the Stay Home Mandate issued by Mayor LaToya Cantrell of New Orleans through a March 16, 2020 proclamation.
5. In light of the above, to protect public health, I am not able to travel to the Krome Detention Center in Miami, Florida, to obtain my client's signature.
6. I spoke with Mr. Flores Ramos via phone call, read the declaration to him, and confirmed the accuracy of the information therein. He has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10, 2020 at New Orleans, Louisiana.

Mary Yanik, on behalf of Ruben Orlando Flores Ramos

DECLARATION OF DAIRON BARREDO SANCHEZ

A No. 212-657-172

I, Dairon Barredo Sanchez, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 22 years old, and I am from Cuba. I came to the United States as a refugee after my step-father was granted refugee status, having been a political prisoner in Cuba.

3. I am currently detained at Glades County Detention Center in Moore Haven, Florida. I have been detained here since on or around **February 13th 2020**.

4. I am seeking adjustment of status pursuant the Cuban Adjust Act with a 212h waiver. My entire family are United States citizens and/or lawful permanent residents. I have one (1) U.S. Citizen child.

5. I suffer from asthma. My asthma conditions leaves me susceptible to complications if I were to be exposed to COVID-19. The virus is known to attack the lungs and mine are weakened by my asthma. I fear that the virus would be fatal for me due to my weakened lungs.

6. I have had six (6) or seven (7) different cellmates since I have arrived at the Glades Detention Center. In my cell, which is very small, there are six (6) people including myself.

7. There are three (3) bunk beds, that are placed close together. I sleep on the top bunk and my bunkmate sleeps on the bottom.

8. The cells are small, and the bunk beds have the mattresses close to one another. It is not possible to stay six (6) feet away from cellmates.

9. New detained men are placed into my pod daily and I am not sure if they have previously been tested to confirm that they do not have COVID-19 and I do not know if they have been placed in quarantine before putting them with all of the other detainees.

10. I am very concerned because all of my cellmates, including myself, have had a cough and are clearly sick. At night everyone is coughing and sneezing a lot and some are even coughing up blood.

11. I had not been able to see a doctor until today, April 9th 2020. Prior to said date I had been told that I was not priority. Today when I was able to finally see the doctor, they gave me an inhaler and an allergy pill. They did not do any COVID-19 tests on me and they did not check my temperature.

12. In general, the pods are crowded, making it impossible to maintain six (6) feet of distance from other people. More people keep coming into the detention center.

13. We all use the same bathroom and showers, which are not often cleaned. There are three (3) toilets downstairs and four (4) toilets upstairs. There are also three (3) showers upstairs and three (3) showers downstairs. Neither the toilets nor the showers are six (6) feet apart from each other in fact they are right next to each other. The showers are only divided by a mid-wall to cover their private areas.

14. We are allowed to shower as many times a day as we would like as long as it is before eleven o'clock at night because after that we are not allowed to take a shower.

15. We are allowed to wash our hands as many times as we would like throughout the day, but we cannot always wash our hands with soap because it would run out very fast and we have to make it last.

16. The detention center is set up so that the detainees are close to each other. Everyone in my pod eats together therefore we are in very close quarters while we eat as well. There is no way for me to be able to stay six feet away from the others as has been recommended.

17. At mealtime there are about ninety (90) or ninety five (95) people in the same room at the same time. It is extremely crowded and the tables and chairs are bolted to the ground and are not able to be moved, and even if they could be moved the room is not big enough to hold that many people in it at the same time and still maintain a distance between each person of six (6) feet.

18. Everyone has been coughing and sneezing a lot in the detention center. Including myself. Some people are even coughing up blood.

19. We are not provided with masks or any other means of protecting ourselves from the virus. I made myself a mask out of a T-Shirt but was forced to take it off because I was told that it was causing panic around the other detainees.

20. We are also not provided with any type of medicine. I asked for some one day, but they told me that they are not providing any type of medicine.

21. There is no hand sanitizer for us to use we are provided with one (1) small bottle of shower gel each. We cannot have more than one (1) bottle at a time because the guards will take it away from us.

22. The detainees prepare the food. They are wearing masks, but I have seen all of them coughing a lot.

23. The detainees clean after each meal; breakfast, lunch and dinner. They clean with bleach and the airducts are filled with a lot of dust. Bleach is the only cleaning product that is provided to clean.

24. All of our clothing is washed together and when they bring the clothing back to us it is still damp.

25. The guards are not wearing masks and gloves. The guards enter our living spaces and touch our things when they deem necessary. They often touch the beds and they touch the detainees when they are going to direct them, cuff them or other reasons of this kind.

26. In the beginning of March, I had two (2) asthma attacks and the guards would not do anything about it. They told me that they did not believe me. I felt like my body was frozen.

27. The night of my asthma attacks I was placed in isolation for one (1) night. While I was walking toward the quarantine cell I could barely move. I felt like I was paralyzed and at one point someone had to grab my head because I was falling backwards. The quarantine cell that I was put in was what we call the punishment cell. It was so cold. I was admitted back into the normal part of the detention center the next day.

28. That night the nurses took a nose swab and told me that I was being tested for the flu. Some of the nurses told me that I had the flu and others told me that I was fine.

29. Though I have money in my commissary there are no masks, gloves or hand sanitizer available for purchase. I have been asking for them as have other detainees, but they continually tell me that there are none available to buy.

30. We have not been trained on what hygiene measures to take to make sure that the virus does not spread. All though we know that we are supposed to stay six feet away from each other and that is very difficult because of the tight quarters that we are in. And they have placed posters on the walls that say things about COVID-19.

31. I have not witnessed officers washing their hands.

32. New detainees are brought in every day to the detention center and I am not sure if they have been in quarantine prior to being included in our area.

33. The only information we are given about COVID-19 are the things that we see on the television that is there. They sometimes put the news on, so we hear things there.

34. Officers routinely touch meal trays and other items in the living and eating areas of the detention centers. They also touch detainees when they cuff them or use force against them.

35. I was scheduled to have my INDIVIDUAL calendar or FINAL trial hearing date on April 10, 2020; however, the hearing was cancelled indefinitely and/or postponed at the 11th hour. Had I had my hearing on April 10, 2020, I believe I would have won my case and would have been released from detention.

36. My family and my attorney were ready to proceed with my case but on April 10, 2020, after multiple phone calls to the Court, my attorney was finally told that my hearing would be rescheduled next week for some time in the future.

37. Despite my vulnerabilities to COVID-19, no member of the medical staff has evaluated my conditions or well-being to determine whether any additional precautionary measures are necessary to protect me from the illness. I am scared for my life.

38. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

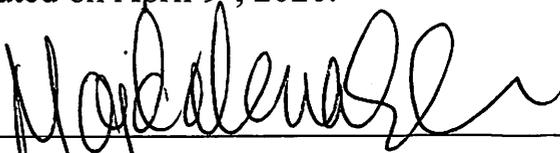
39. If released, I would live with my partner, Kayla Perozo, and child in Orlando, Florida. We will reside at **8255 Deming Drive Apartment 8 Orlando, Florida 32822**. I would be able to practice social distancing and self-quarantine.

40. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9th, 2020.



[Magdalena Ewa Cuprys, on behalf of Dairon Barredo Sanchez]

CERTIFICATION

I, CHELSEA KATHERINE BLAND, declare that I am proficient in the English and Spanish languages.

On April 9th, 2020, I read the foregoing declaration to Dairon Barredo Sanchez and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 9th, 2020.



Chelsea Katherine Bland

ATTORNEY DECLARATION

I, Magdalena Cuprys, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

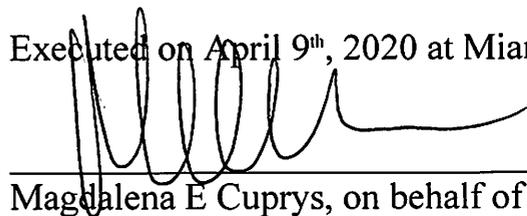
1. My name is Magdalena Ewa Cuprys. I am a licensed attorney in good standing in the state of Florida. I am an active attorney in good standing in the state of Florida.
2. I represent the declarant, Dairon Barredo Sanchez, in his immigration case at the Krome Immigration Court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Dairon Barred Sanchez's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection

(CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County, Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Glades County Detention Center in Moore Haven, Florida, to obtain my client's signature.
6. I spoke with Dairon Barredo Sanchez via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Dairon Barredo Sanchez has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9th, 2020 at Miami, Florida.



Magdalena E Cuprys, on behalf of Dairon Barredo Sanchez

DECLARATION OF TAHIMI PEREZ

A NO. 079-200-263

I, Tahimi PEREZ, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

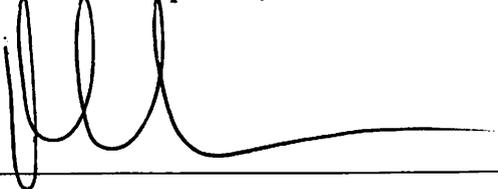
1. I make this declaration based on my personal knowledge except where I have stated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I am twenty-nine (29) years old. I came to the United States as a lawful permanent resident when I was eleven (11) years old and have continuously resided in the United States since my initial entry.
3. My father killed my mother when I was seventeen (17) years old in front of me and I could not stop him. The Hialeah police department responded but my mother had already died. My father was taken to jail and subsequently I was left parentless and alone in the world.
4. I then became romantically involved with a man, Brian Moreno, who was involved in credit card fraud and other things. On one occasion, I was with my Brian and his friend, when he attempted and/or engaged in credit card fraud. I did not know what they were doing because they left me in the car while they went to purchase items with fraudulent and/or stolen credit cards. When they got back into the car and realized that the police were following the car; someone threw the credit cards into my purse without my knowledge. When the police searched my purse, the cards were there, but I was not aware that they were fraudulent as they all had Brian's name on them. Even though I had an attorney, I ultimately pled to charges of the fraudulent use of personal identification information even though I did not use anyone's personal information fraudulently, nor did I know that Brian was doing so. But, I was present with him in the car when he apparently engaged in said crime and while he smoked marijuana.
5. I was sentenced to two (2) years probation, which I completed successfully.
6. I am currently detained at the GLADES COUNTY DETENTION CENTER in Moore Haven, Florida. I have been detained here since on or about **January 22, 2020**.

7. I have a pending Form EOIR-42A, Application for Cancellation of Removal for Certain Permanent Residents. I have resided in the United States for eighteen (18) years as a Lawful Permanent Resident as I was accorded status on April 4th, 2001.
8. I suffer from poor health and asthma and have been to the hospital in the past due to severe coughs and my asthma condition. I have a history of asthma and upper respiratory infections. My poor health leaves me susceptible to complications if I were to be exposed to COVID-19. The virus is known to attack the lungs and mine are weakened by my asthma and history of upper respiratory infections. I fear the virus would be fatal for me due to my already weakened lungs.
9. I have had many different cellmates since I arrived at the Glades County Detention Center. In my cell, which is very small, there are six (6) people including myself.
10. The cells are extremely small and it is impossible to stay six (6) feet away from my cellmates. There are new detainees placed in my cell all the time and that concerns me because I do not know if they have been previously tested to confirm that they do not have COVID-19 and I do not know if they have been placed in quarantine before placing them into our cells.
11. I am very concerned because there have been many detainees coughing and sneezing and no precautions are being taken here.
12. Further, the detention center is set up so that detainees are close to each other when we eat. All of us eat together in close quarters. There is no separation. The table area forces us to eat right next to each other. Neither the tables or chairs can be moved.
13. In general, the pods are crowded, making it not possible to maintain six (6) feet of distance from other people. More people keep coming into the detention center.
14. We do not have hand sanitizer available in the common area and they do not provide us with any hand sanitizer. They do not provide us masks or gloves either.
15. While I have money in my commissary account, there are no masks, gloves, or hand sanitizers available for purchase. Detainees have been asking for masks for weeks, but there is nothing available.

16. We have only been told to clean the tables with a little bit of alcohol and a rag, but nothing else.
17. I have not been tested for COVID-19, and I am not aware of anyone else that has been tested. I have requested to be tested because I am concerned about my health due to my chronic asthma condition, but I have not received any response or indication that I will be tested anytime soon.
18. I know that there are other people who have chronic illnesses who are high risk for COVID-19 complications.
19. I am particularly worried about my own health because my medical condition has worsened since entering ICE custody.
20. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.
21. I am now in the process of submitting a request for a humanitarian release with ICE, through my attorney, based on my medical issues.
22. If released, I would reside with my partner, Rolando Gonzalez, at **7061 West 14th Court Apt #5 Hialeah, Florida 33014**. Being in my home with my partner would allow me to practice social distancing and self-quarantine.
23. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 10, 2020.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end, positioned above a solid horizontal line.

Magdalena E Cuprys, on behalf of Tahimi Perez

ATTORNEY DECLARATION

I, Magdalena Cuprys, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Magdalena Cuprys. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Tahimi Perez, in her immigration case at the Krome Immigration Court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Tahimi Perez' declaration on her behalf and with her expressed consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposable vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County, Florida and unable to travel to Georgia under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.
5. I am a cancer survivor with a compromised immune system and a single mom to a six (6) year old child who was diagnosed in vitro with a hypoplastic heart and suffers from asthma.
6. In light of the above, to protect public health, to protect myself and my child, I am not able to travel to the Glades County Detention Center in Moore Haven, Florida, to obtain my client's signature.

7. I spoke with Tahimi Perez via phone call, read the declaration to her, and confirmed the accuracy of the information therein. Tahimi Perez has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10, 2020 at Miami, Florida.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end, positioned above a solid horizontal line.

Magdalena Cuprys, on behalf of Tahimi Perez

Attorney

Serving Immigrants Inc.

4011 West Flagler St, Suite 406, Miami, FL 33134

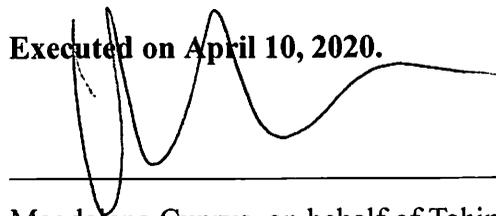
DECLARATION OF TAHIMI PEREZ

I, Tahimi Perez, am the individual in the attached declaration.

I have authorized my attorney 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 declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10, 2020.

A handwritten signature in black ink, appearing to read 'Magdalena Cuprys', written over a horizontal line.

Magdalena Cuprys, on behalf of Tahimi Perez

DECLARATION OF FRANKLIN RAMON GONZALEZ

A038-504-396

I, Franklin Ramon Gonzalez, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have stated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 53 years old, and I am from the Dominican Republic.

3. I am currently detained at Glades County Detention Center in Moore Haven, Florida. I have been detained here since on or around February 24, 2020.

4. I am seeking cancellation of removal pursuant to Section 240A(a) of the Immigration and Nationality Act (“INA”). I have 3 U.S. citizen children.

5. I had open heart surgery on December 23, 2019. I suffer from coronary artery disease, severe triple-vessel coronary artery disease, diastolic heart failure, atrial fibrillation, tachycardia-bradycardia syndrome, sick sinus syndrome with sinus bradycardia, essential hypertension, diabetes mellitus type 2, dyslipidemia, COPD, asthma, obesity, and nicotine dependence. My medical conditions leave me susceptible to complications if I were to be exposed to COVID-19. The virus is known to attack the lungs, and mine are weakened by my medical conditions. Additionally, my heart is not functioning as well as it should be since my open heart surgery, leaving me more prone to larger heart issues if it is strained from this virus. I fear the virus would be fatal for me due to my already weakened health.

6. I have had different cellmates since I arrived at Glades County Detention Center. We shared a bathroom and everything else within the room. I slept on the bottom bunk, and my bunkmates slept on the top.

7. The cells are small and the bunk beds have the mattresses close to one

another. It is not possible to stay six feet away from cellmates.

8. When new detained men were placed into my room, they were put there without having been tested to confirm they do not have COVID-19. Only one of my cellmates was quarantined for a couple of days before he was put back in my cell. Most of them said that they had not been quarantined.

9. I am very concerned because one of my cellmates has a cough and is sick. He has not been isolated from the rest of us.

10. The detention center is set up so that detainees are close to each other when we eat. We eat together in close quarters, where there are tables with chairs set up in the center of the room. We are not allowed to move the seating. As a result, we are forced to eat near one another.

11. In general, the pods are crowded, making it not possible to maintain six feet of distance from other people. More people keep coming into the detention center.

12. As of a couple of days ago, 12 people were placed into what they are calling a quarantine pod.

13. We are not given hand sanitizer in the common area of the pod. We have our own soap and we are expected to make it last until it is distributed again.

14. Even if I have money in my commissary account, there are no masks, gloves, or hand sanitizer available for purchase. Detainees have been asking for masks for weeks, but there is nothing available. I was given a mask by a nurse, but an officer told me not to wear the mask in order avoid other detainees to panic.

15. The officers who run the detention center have not trained me or the other detainees on how to try and limit the spread of COVID-19.

16. Until very recently, detainees have not been provided masks, gloves or hand sanitizer.

17. I asked to be tested for COVID-19 since I had flu-like symptoms. I was

tested for the flu and test came back negative. I have not been tested for COVID-19, and I am not aware of anyone else in detention having been tested.

18. I am particularly worried about my own health because my medical condition.

19. It is likely that the Glades County Detention Center lack the capacity to handle COVID-19 cases.

20. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

21. I already submitted with ICE, through my attorney, a Request for Humanitarian Release based on my medical issues and my request was denied.

22. If released, I would live with my brother, Wilson L. Gonzalez in Kissimme, Florida. In this place, I would be able to practice social distancing and self-quarantine.

23. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 11, 2020.

A handwritten signature in black ink, appearing to read 'JA', with a large loop at the end.

Jose A. Guerrero, on behalf of Franklin Ramon Gonzalez

ATTORNEY DECLARATION

I, Jose A. Guerrero, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

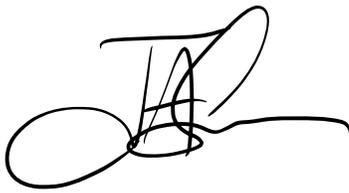
1. My name is Jose A. Guerrero. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Franklin Ramon Gonzalez, A038-504-396, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Franklin Ramon Gonzalez's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County, Florida and unable to travel to Moore Haven, Florida under a state 'Stay at

home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Glades County Detention Center in Moore Haven, Florida, to obtain my client's signature.
6. I spoke with Franklin Ramon Gonzalez via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Franklin Ramon Gonzalez has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 11, 2020 at Miami, Florida.

A handwritten signature in black ink, appearing to be 'JA' with a large flourish extending to the right.

Jose A. Guerrero, Esq.
GR Law Firm, PLLC
1431 Ponce de Leon Blvd
Coral Gables, FL 33134
jose@grlawfirm.net
Tel. (305) 777-0423

DECLARATION OF FRANKLIN RAMON GONZALEZ

A038-504-396

I, Franklin Ramon Gonzalez, am the individual referred to as Franklin Ramon Gonzalez in the attached declaration.

I have authorized my attorney 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 declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 11, 2020.

A handwritten signature in black ink, appearing to be 'JA' with a large flourish extending to the right.

Jose A. Guerrero Esq., on behalf of Franklin Ramon Gonzalez

DECLARATION OF GERARDO VARGAS

I, Gerardo Vargas, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have stated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 57 years old, and I am from Mexico.

3. I am currently detained at Glades Correctional Facility in Moore Haven, Florida. I have been detained here since on or around December 10, 2019.

4. I am seeking Cancellation of Removal for Certain Permanent Residents. I have 3 U.S. citizen children and a Legal Permanent Resident wife.

5. I suffer from Diabetes. My condition leaves me susceptible to complications if I were to be exposed to COVID-19. The virus is known to attack the lungs, in particular those with underlying medical conditions like mine. I fear the virus would be fatal for me due to my already weakened health.

6. I have had different cellmates since I arrived at Glades Correctional Facility. There are six of us to a cell, and on the entire floor there are about 48 individuals. The entire unit is full at this time, with about 96 men detained. We all share bathroom facilities. The cells are small and the bunk beds have the mattresses close to one another. It is not possible to stay six feet away from cellmates.

7. The detention center is set up so that detainees are close to each other when we eat. We eat together in close quarters. Each table is supposed to seat 4, but right now we are 5-6 people per table, as the unit is full. As a result, we are forced to eat near one another.

8. In general, the pods are crowded, making it not possible to maintain six feet of distance from other people. More people keep coming into the detention center.

9. When I was first detained in December 2019, several men got very sick and had to be taken out of the general population. We were told they had the flu. We were placed in quarantine for about 20 days. The men who had been removed were returned after that time. I do not know if they were tested for COVID-19 or not. That is the only quarantine since I have been detained.

10. Despite my underlying condition, I have not been placed into what they are calling a quarantine pod despite being at high risk of being affected severely by the virus.

11. While I have money in my commissary account, there are no masks, gloves, or hand sanitizer available for purchase. Detainees have been asking for masks for weeks, but there is nothing available. We are only provided with regular toiletries, such as toilet paper, toothbrush, toothpaste, and soap.

12. The officers who run the detention center have not trained me or the other detainees on how to try and limit the spread of COVID-19.

13. I do not know if I have already been exposed to COVID-19.

14. I seen few officers wearing masks or gloves. Detainees have not been provided masks or gloves. I have not witnessed officers washing their hands.

15. Officers routinely touch meal trays and other items in the living and eating areas of the detention centers. They also touch detainees when they cuff them or use force against them.

16. I have not been tested for COVID-19, and I am not aware of anyone else in detention having been tested.

17. I had a cough when I first arrived at Glades Detention Facility, but I have not been tested for COVID-19. The medical staff at the Glades Correctional

Facility are aware of my underlying condition of Diabetes. Since the medical staff have not been responsive to me before the COVID-19 threat, it is likely that they lack the capacity to handle COVID-19 cases at Glades Correctional Facility.

18. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

19. I am also submitting with ICE, through my attorney, a Request for Humanitarian Release based on my medical issues.

20. If released, I would live with my family in Wauchula, Florida where would be able to practice social distancing and self-quarantine.

21. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed this 9th day of April, 2020.

A handwritten signature in blue ink, appearing to read "A. Velazquez", is written over a horizontal line.

Amanda Velazquez, Esq. on behalf of Gerardo Vargas.

ATTORNEY DECLARATION

I, Amanda Velazquez, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Amanda Velazquez. I am a licensed attorney in good standing in the state of Iowa. My practice is limited to Immigration Law in the State of Florida.
2. I represent the declarant, Gerardo Vargas, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Gerardo Vargas' declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Monroe County,

Florida and unable to travel to Glades County, Florida under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. I have a minor child who suffers from an auto-immune disease (Type 1 Diabetic), which makes him particularly vulnerable to COVID-19, therefore making my ability to travel and expose myself to the virus even more serious.
6. In light of the above, to protect public health, I am not able to travel to the Glades Detention Center to obtain my client's signature.
7. I spoke with Gerardo Vargas via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Gerardo Vargas has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of April, 2020



Amanda Velazquez, Esq. on behalf of Gerardo Vargas
422 Fleming St.
Key West, Florida 33040

DECLARATION OF GERARDO VARGAS

I, Gerardo Vargas, have authorized my attorney 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 declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020



Amanda Velazquez, Esq. on behalf of Gerardo Vargas.

DECLARATION OF FRANCISCO RIVERO VALERON

I, Francisco Rivero Valeron, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 57 years old, and I am from Cuba.

3. I am currently detained at Glades County Detention Center in Moorehaven, Florida. I have been detained here since January 26, 2020.

4. I am a Lawful Permanent Resident and have held such status since December 11, 1997. On March 18, 2020, Immigration Judge Maria Lopez Enriquez terminated my removal proceedings. The Department of Homeland Security appealed the judge's decision to the Board of Immigration Appeals. On March 19, 2020, DHS Supervisory Detention & Deportation Officer James Gamboa declined to release me from detention.

5. I have a Lawful Permanent Resident wife, 2 U.S. citizen children and 3 U.S. citizen grandchildren.

6. I suffer from hypertension, mixed hyperlipidemia, tremors, gastroesophageal reflux with esophagitis, anxiety, and depression. My gastroesophageal and hypertension conditions leave me susceptible to complications if I were exposed to COVID-19. I fear contracting virus as I have a weakened immune symptom due to my medical conditions that could further exacerbate my weakened health. I currently take Losartan and Prilosec for my medical conditions.

7. There are currently 96 people detained in my pod, which consists of 16 cells. The cells are small and all 96 detainees must share one toilet. During our meals, we are only about 40 to 50 centimeters apart from each other. There is only about 1 meter of distance of space between each of us when we sleep. There is no possible

way to stay six feet away from cellmates.

8. Detainees are only given a small amount of soap twice a week. We must use this soap to bathe and to wash our hands. We cannot wash our hands as much as we would like to as we do not have enough soap. There is no hand sanitizer available at the detention center. We cannot purchase any hand sanitizer.

9. The detainees at Glades prepare the food and also are in charge of cleaning the common spaces. The detainees do not wear gloves and/or face masks when cleaning. There has been no training on protective personal gear when cleaning in order to limit the spread of diseases. While I have money in my commissary account, there are no masks, gloves, or hand sanitizers available for purchase. There are no wipes or soap available to clean the phones. We are forced to use wet paper towels to clean the phone in between phone calls.

10. The staff at the detention center does not wear any protective gear. I have not seen the staff wash their hands despite the fact they pass out and pick up our food trays.

11. Over the past two weeks, I have seen about 15 to 20 new detainees transferred into my pod. These new detainees have not been quarantined since their arrival. I am worried about my health and the risk of being infected by COVID-19.

12. Since entering ICE custody, my health issues have worsened. I have visited the doctor at the detention center and requested treatment for my tremors and anxiety/depression, but they refused to provide anything. I have been suffering from low blood pressure despite my prescription medication.

13. There has been no announcement, quarantine, formal education on hand hygiene or social distancing at the Glades County Detention Center. There two to three detainees in my pod who are visibly sick and coughing. The staff has not taken any measures to either treat these individuals or to protect the rest of the detainees from them.

14. Despite my vulnerabilities to COVID-19, no member of the medical staff has evaluated my conditions or well-being to determine whether any additional precautionary measures are necessary to protect me from the illness. I am scared for my life. I have not seen an ICE officer or employee in three weeks.

15. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

16. If released, I would return to my home at 1621 8th Street NE Naples, Florida 34120 with my wife. If released, I would follow all recommendations issued by the Center for Disease Control and the Florida Department of Health and practice socially distancing and self-quarantine.

17. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 8, 2020.

Alexandra Friz-Garcia

Alexandra Friz- Garcia, on behalf of Francisco Rivero Valeron

CERTIFICATION

I, Alexandra Friz- Garcia, declare that I am proficient in the English and Spanish languages.

On April 8, 2020, I read the foregoing declaration to Francisco Rivero Valeron and orally translated it faithfully and accurately into Spanish in the presence of the

declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 8, 2020.

Alexandra Friz-Garcia

Alexandra Friz- Garcia

ATTORNEY DECLARATION

I, Alexandra Friz- Garcia declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Alexandra Friz-Garcia. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Francisco Rivero Valeron, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Francisco Rivero Valeron's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami-Dade County,

Florida and unable to travel to visit my client under a state ‘Stay at home’ order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Glades Detention Center in Moorehaven, Florida, to obtain my client’s signature.
6. I spoke with Francisco Rivero Valeron via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Francisco Rivero Valeron has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 8, 2020 at Miami, Florida.

Alexandra Friz-Garcia

Alexandra Friz- Garcia, on behalf of Francisco Rivero Valeron

DECLARATION OF IRVIN MENDOZA-SILIS

I, Irvin Mendoza-Silis, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 30 years old, and I am from Mexico.

3. I am currently detained at Glades County Detention Center in Moore Haven, Florida. I have been detained here since March 6th.

4. I have a 1-year-old U.S. citizen child and a U.S. citizen wife. I am seeking Cancellation of removal for persons who are not lawful permanent residents.

5. I suffer from asthma since I was a kid (Around 4 or 5 years old). I am also allergic to dust and grass. I have asthma bronchospasm episodes around once a month. I haven't been feeling good lately. I have been afraid of getting COVID-19 because there is no soap, shampoo, toothpaste or hand sanitizers available for inmates or guards. I have had to trade food for hygiene products in the past.

6. There are 6 inmates per cell, which makes it impossible to keep distance between us. Also, the walls are full of mold, which makes my asthma worse.

7. I have been treated with Albuterol because I was unable to breathe, had a headache and was feeling feverish. I also feel like my tonsils often get swollen. I also have two infected teeth. My medical condition has worsened considerably since entering ICE custody.

8. There have been no measures taken in response to COVID-19. Despite my vulnerabilities because of my breathing problems, no member of

the medical staff has evaluated my conditions or well-being to determine whether any additional precautionary measures are necessary to protect me from the illness. I am scared for my life.

9. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

10. If released, I would live with my mother and wife in Largo, Florida. I would be able to practice social distancing and self-quarantine. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.

A handwritten signature in black ink, appearing to read "Laura Kelley", is written over a solid horizontal line.

Laura Kelley, on behalf of Irvin Mendoza-Silis

CERTIFICATION

I, Daniela Tulande declare that I am proficient in the English and Spanish languages.

On April 8th, 2020, I read the foregoing declaration to Irvin Mendoza-Silis and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 8th, 2020.



Daniela Tulande

ATTORNEY DECLARATION

I, Laura Kelley, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

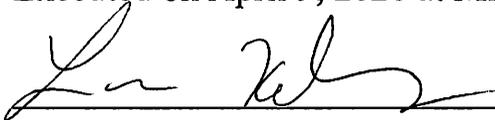
1. My name is Laura Kelley. I am a licensed attorney in good standing in the state of Florida. I am an inactive attorney in good standing in the state of California.
2. I represent the declarant, Irvin Mendoza-Silis, in his immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Irvin Mendoza-Silis's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of

Miami-Dade County, Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Glades Detention Center in Moore Haven, Florida, to obtain my client's signature.
6. My staff and I spoke with Irvin Mendoza-Silis via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Irvin Mendoza-Silis has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Miami, Florida.



Laura Kelley, on behalf of Irvin Mendoza-Silis

DECLARATION OF ROSELINE OSTINE

I, Roseline Ostine, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have stated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 46 years old, and I am from Haiti.

3. I am currently detained at Glades County Detention Center in Moore Haven, Florida. I have been detained here since on or around January 2019.

4. I have 2 U.S. citizen children. My mother, granddaughter, and many nieces and nephews are also U.S. citizens.

5. I was ordered removed on May 22, 2019, but my removal proceedings were remanded and reopened. My son, Brandon Wiggins, filed an I-130 application so that he can sponsor me for a green card. A hearing for my readjustment of status is scheduled for May 19, 2020.

6. I suffer from anxiety, major depression with psychosis, epilepsy, and human immunodeficiency virus (HIV). My HIV leaves me especially susceptible to complications if I were to be exposed to COVID-19, because my body cannot fight off infections as well as other people can. I am also afraid that if I get COVID-19, it could make my epilepsy worse, because stress usually increases my seizures. I fear the virus would be fatal for me due to my already weakened health.

7. In addition to my chronic health problems, I am currently experiencing bad headaches and a runny nose.

8. I am concerned because new detainees arrive at Glades every day. Two women already had coughs when they arrived here recently. I do not know

whether they've been tested for COVID-19.

9. We are not provided with hand sanitizer. We get soap twice a week and we are expected to make it last until it is distributed again. We used to get a full bottle of soap twice a week, but now we only get half a bottle of soap twice a week, and we have to make it last for showers as well as hand-washing.

10. I do not know if I have already been exposed to COVID-19.

11. Until very recently, I have not seen officers wearing masks, and I've only seen masks on some of the medical officers. Many officers still don't wear masks. Detainees have not been provided masks or gloves.

12. I am particularly worried about my own health because my medical condition has worsened since entering ICE custody. My epilepsy is getting worse from the stress of detention and anxieties about COVID-19. I am having seizures in my sleep. Last month, one of these seizures was so bad that I bit my tongue and ground down some of my teeth. I have also started experiencing headaches.

13. If I am released from detention, I will comply with any applicable conditions of release including wearing an ankle monitor, and attending check-ins and immigration court hearings.

14. My attorney contacted my deportation officer highlighting my medical issues and inquiring whether there was any possibility of being released. That request was denied.

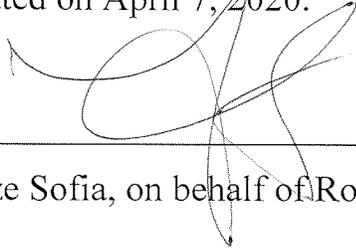
15. If released, I would live with my son, Brandon, in Miami, Florida. I would be able to practice social distancing and self-quarantine at his home.

16. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true

and correct.

Executed on April 7, 2020.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the left.

Fairuze Sofia, on behalf of Roseline Ostine

ATTORNEY DECLARATION

I, Fairuze Sofia, declare the following under penalty of perjury pursuant to 28 U.S.C.

§ 1746:

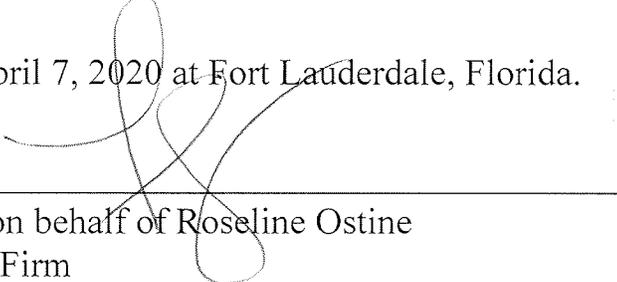
1. My name is Fairuze Sofia. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Roseline Ostine, in her immigration case in Krome immigration court in Miami, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Roseline Ostine's declaration on her behalf and with her express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Broward County, Florida and should not be traveling to Glades County, Florida under a state

'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to Glades County Detention Center in Moore Haven, Florida to obtain my client's signature.
6. I spoke with Roseline Ostine via phone call, read the declaration to her, and confirmed the accuracy of the information therein. Roseline Ostine has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 7, 2020 at Fort Lauderdale, Florida.



Fairuze Sofia, on behalf of Roseline Ostine
The Sofia Law Firm
3313 W Commercial Blvd
Suite 190
Fort Lauderdale, FL 33309

DECLARATION OF SIRVANILDO BIBIANO SOARES

I, **SIRVANILDO BIBIANO SOARES**, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 34 years old and I am from Brazil.

3. I am currently detained at Transitional Center, in Pompano Beach. I have been detained here since March 6, 2020.

4. I have been living in the United States since 2005.

5. I suffer from a gastroesophageal reflux and I have a pancreatic condition. I also had pneumonia recently. Since I have been at BTC, I asked to see a doctor because I was with flu symptoms such congestion. I work at the kitchen and I was released from my work due to my condition. I have been asking to make some exams and to see a doctor, but they ignore me. The only medication I was given was to my heartburn due to my gastroesophageal condition. They never gave me anything to my flu symptoms. During the last three days I was coughing and was not treated either. The only thing they did to me was to take my blood two weeks ago, but they never gave me results or referred me to a doctor.

6. My gastroesophageal reflux, pancreatic condition, and recent pneumonia make me susceptible to complications if I were exposed to COVID-19I fear contracting this virus.

7. I have been living in a room with three other people. My bedroom has two bunkbeds and they are very close to each other. It is impossible to keep distance form my roommates. In addition, the guards enter the room several times per night and they do not use any type of prospective gear or gloves.

8. During the day I spend some hours at my apartment, other hours in the common area and I also work in the kitchen preparing food. While I am inside the apartment I a with my roommates. While I am out o my bedroom, everybody stays in the same environment. It is

impossible to keep distance since we have to enter a line to get food and we eat surrounded by others.

9. The food is prepared by the detainees including myself. We were not taught hygiene measures to the COVID -19 and we do not use masks while preparing food, only gloves. The only advice they gave us is to wash the hands before preparing the food. We also do the cleaning after the food is served. We use do not use gloves or masks to clean the facility.

10. Soap and hand sanitizers are not given as needed. They give us small soaps for bath, and we must buy shampoo at the commissary to be able to use it as liquid soap because the soap they give to us is not enough. Do not see hand sanitizer available here.

11. I try to bath twice per day while in my bedroom. In addition, I can only wash my hands if I am at my bedroom because there are no other stations to wash and clean hands while I am out of my bedroom.

12. In the first weeks of the COVID-19 we had some masks available. After that, no more masks were given to us. The only ones who uses masks are the people who work there when they arrive. They also use protective gear when they enter the place where some people are isolated.

13. There are some people who are segregated from others because they are suspected o have the COVID-19. We can observe these people through a glass window. I asked one of the guards and he told me they are in isolation because they are suspected to have the COVID. There is a sign on the door that I was unable to read what it says.

14. When I go to my bedroom those people who are isolated get released and they walk in the same common area we were using before they being released. They use the same telephone the other people who are not isolated use. I feel afraid to touch the telephone and get the virus, My attorney asked me how I could see the people released using the same space I was using before. I explained her that we can see even from our bedrooms.

15. I don't see the staff or the guards washing their hands and I see them all the time touching detainees and entering our bedrooms touching everything inside such bedrooms and

doorknobs.

16. I have been seen several detainees coming in to BTC in the past weeks. I also see a movement of nurses with gears coming and leaving the facilities all the time. In one of these occasions my attorney was there and she saw that a nurse from outside the facility came in to help with someone who was passing out. She was using protective gear. There is an increasing number of medical staff entering the facility all the time. However, they are all protected, and no one tells us where they are going and why they are here.

17. I have seen several people sick at BTC and I am afraid to get infected. There are people who went to hospital for pneumonia and other problems. Yesterday they removed someone who was throwing up everywhere. He was taken to the hospital. In these last two weeks I have seen much more people being taken to the hospital than when I arrived here. This makes me scared to get contaminated.

18. As I mentioned above, I have been asking to see a doctor because of my conditions that make me more susceptible to the COVID-19. The only action they took was to drain my blood but never gave me results or said anything about that. They never evaluated my conditions or well-being to determine whether any additional precautionary measures are necessary to protect my life. I am scared for my life and I do not want to die at an immigration facility.

19. The facility is not taking educative measures to educate and to protect the detainees. They try to hide everything that is happening here. The only people who are in quarantine are the ones isolated mentioned above. The rest of the population is all together, and no social distance is possible. No one taught us that we must wash hands often and use hand sanitizer. As I mentioned, soap here is limited unless you buy shampoo to use as liquid soap.

20. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

21. I will be living at my friend's house where I was living before being detained. My belongings are all there and it is difficult to move out during these times. I also have a financial sponsor who is committed to provide for my financial needs such as food, room and transportation if

I am released.

22. I am afraid of getting sick and the underlying conditions I have can make me vulnerable to this virus. I fear for my life.

I declare under penalty of perjury that the things described above are true and correct.

Executed on April 10, 2020.



Silvanildo Bibiano Soares.

CERTIFICATION

I, Tatiana Ferreira Da Cunha declare that I am proficient in the English and Portuguese languages. On April 10, 2020, I read the foregoing declaration to Sirvanildo Soares and orally translated it faithfully and accurately into Portuguese in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate. I declare under penalty of perjury that the foregoing is true and correct.

Executed April 10, 2020.



Tatiana Ferreira Da Cunha

ATTORNEY DECLARATION

I, **TATIANA FERREIRA DA CUNHA**, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Tatiana Ferreira Da Cunha. I am a licensed attorney in good standing in the state of Florida. I am an inactive attorney in good standing in Brazil.
2. I represent the declarant, Sirvanildo Bibiano Soares, in his immigration case at Broward Transitional Center immigration court in Pompano Beach, Florida.
3. DHS is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. I visited my client at Broward Transition Center on the following dates: March 9, 2020, March 24, 2020, and April 10, 2020.
5. During my visits on March 24 and April 10, I was required to use mask and gloves. However, the facility does not give masks for attorneys. I saw two attorneys leaving the facility on March 24 because they did not have proper gear and the personnel at the facility refuse to furnish the attorneys with masks and gloves.
6. On March 9, my client was using a mask. However, during my visits on March 24 and April 10 he did not have a mask.
7. On March 24 I observed a movement of nurses coming and leaving the facility. Everybody was using masks, except the detainees. During that visit, my client explained he was afraid to get COVID-19. I observed he had flu symptoms on that day, and I asked him if he had

seen a doctor. He informed he was trying to get a doctor for his gastroesophageal issues, but no one assisted him yet. He told me he requested a blood test and was waiting.

8. On that day (March 24, 2020) there were signs at the attorney rooms stating the attorney should keep distance from the client and that handshakes and hugs between client and attorney were not allowed. The sign also stated the detainee could not use any pen other than the facility pen when signing documents. When I visited my client today, April 10, 2020, the signs were not there anymore and there were no pens at all for the detainees to sign.
9. My client told me today the same facts he told me in the previous visits: that there are detainees who are being on isolation because they are suspected to have the COVID. I asked my client how he knew that, and I asked him whether he heard that from other detainees. He explained me that one of the guards at the facility told him those people were isolated from the rest of the population because they were suspected to have the COVID-19. He further stated that people on isolation are release once the non-isolated go to their rooms.
10. My client stated again that he has been asking to see a doctor at the facility, but no one assisted him until this moment. He said he was only given a stomach medicine one day, but he was never seen by a doctor. He stated he is suffering with his gastro issues and he is afraid to get COVID-19 since he had recent pneumonia.
11. My client told me they have small soaps for bath at their rooms, but they do not wash their hands while out of the bedrooms. He told me he baths himself with shampoo that he needs to buy from commissary. They do not have hand sanitizer available for them.

12. Today I witnessed at the front desk of the facility four big bottles of hand sanitizer that I assume are used for the employees, not for the detainees. I also saw that all the employees at the facility were using protective gear such masks and gloves. When I was leaving the facility, I saw the detainees in a line probably coming from the place they had lunch. They were very close to each other. There was no social distance between the detainees.
13. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. I am part of the people at risk because I have a history of respiratory infections and now, I have high blood pressure, for which I am being treated. However, I decided to take the risk to visit my client today to get his signed declaration because I have the duty to document what I see.
14. I have been representing Mr. Soares since January and in my opinion my client is at risk to get infected with COVID-19.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10, 2020 at Miami, Florida.



Tatiana Ferreira Da Cunha
Florida Bar # 1015530

DECLARATION OF MAIKEL BETANCOURT

I, Maikel Betancourt, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 37 years old and from Cuba.

3. I am currently detained at Broward Transitional Center in Pompano Beach, Florida. I have been detained here since March 26, 2020.

4. I have a wife and two children who are still in Cuba, and my mother-in-law, a lawful permanent resident, lives in Miami. I have been in the U.S. since May 10, 2019, and will be eligible to apply for my Green Card under the Cuban Adjustment Act starting May 10, 2020.

5. I have hypertension, high blood pressure, especially in my right leg, because I suffered an accident that hurt my leg. I also have a depressed immune system. When I was in detention previously Louisiana, they gave me a blood analysis and found high cholesterol and a thyroid problem. This makes me more vulnerable to coronavirus, and many people with hypertension have complications with coronavirus that lead to fatalities.

6. I sleep with five other people sleeping in the same room. We are in bunk beds and the beds are less than one meter apart when we sleep. Our chairs are attached to the floor when we eat, and we have one meter between us of distance.

7. There are many times when it is impossible to stay 6 feet away from other people. When we are waiting in line for the eating area we are almost touching each other and are very close together, one after the other. When we are using the phones, we are also very close together, 30-40 centimeters after the next,

with about 11 telephones beside each other. We are also at the most 3 feet away from each other when we are eating, with about 50 people in the room together at the same time. We are less than 3 feet from each other when we sleep.

8. There is often not soap available to use in the facility. We do not receive hard soap but liquid soap that we have to bring with us wherever we want to wash our hands, and sometimes it runs out. There is a dispenser of hand sanitizer in the entry of the dining hall, but I have not ever seen it contain hand sanitizer. Everyone who has money waits in line at night to get their own hygiene supplies in the commissary, and it runs out so not everyone can get it. I also often do not have money in my account to make purchases in the commissary.

9. Detainees prepare the food for us. Some detainees wear gloves and masks but others do not. Detainees also do the cleaning, and I do cleaning of my room. While I have seen people wear gloves, people do not wear masks while they clean.

10. I am only given gloves to use one time when I clean my room, but otherwise do not have access to gloves or a mask, nor are they available for purchase in the commissary.

11. We have not been trained on how to limit the spread of coronavirus. I only know that I should not touch my face and that I should be distant from other people because I learned this watching the TV. I am only given gloves to use one time when I clean my room, but otherwise do not have access to gloves or a mask, nor are they available for purchase in the commissary.

12. The majority of guards and ICE officials in the center are not wearing gloves, masks, or other protective gear. I have seen some guards wear them, but most do not. Sometimes the guards salute the detainees by hitting each other's fists, without wearing gloves. When we go to change our clothes to get clean ones, they touch our clothes without using gloves to hand it to us. They also touch other

items in our rooms without using gloves.

13. New detainees were brought in just last week from Krome Detention Center, and they were not quarantined.

14. I have had problems accessing medical care since I have been in ICE custody. When I was detained in ICE custody in Louisiana, my leg was very inflamed from circulation problems, and I asked for the medicine I typically take to treat it, but the staff did not give me the pill so my aunt had to send it to me. My condition got so bad that I had to go to the hospital. I am not certain how my medical condition is now because I have not receive any attention in BTC.

15. The staff in the facility have not taken measures to educate us about coronavirus or made any announcements. I only there are rooms that are under quarantine, but the staff haven't explained to us why.

16. I know that a group of men are sick who are quarantined, but those men enter and use the same dining hall, chairs and tables that we do before us and I do not see the guards clean the space before we enter. These men also use the same phones as we do, and I do not see the guards cleaning these spaces before we enter after the men. The guards work with those men and also with us. I have seen the guards wear gloves and masks when they enter the quarantined area.

17. I have not seen any more medical attention or staff since the coronavirus began.

18. Despite my vulnerabilities to COVID-19, no member of the medical staff has evaluated my conditions or well-being to determine whether any additional precautionary measures are necessary to protect me from the illness. I am scared for my life.

19. If I am released from detention, I will comply with any conditions of release including attending check-ins and immigration court hearings.

20. If released, I would live with my aunt Natacha Betancourt, a U.S.

Citizen, at her house on 160 61st Street, West New York, New Jersey, 07093. She has a separate room for me, so I would be able to socially distance and isolate myself from other individuals.

21. I have authorized Meredith Hoffman, a law student at the University of Miami School of Law, 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.

Meredith Hoffman

Meredith Hoffman, on Behalf of Maikel Betancourt

CERTIFICATION

I, Meredith Hoffman, declare that I am proficient in the English and Spanish languages.

On April 9, 2020, I read the foregoing declaration to Maykel Valera Ramirez, and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 9, 2020.

Meredith Hoffman

Meredith Hoffman

LAW STUDENT DECLARATION

I, Meredith Hoffman, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Meredith Hoffman. I am a law student in the University of Miami School of Law Immigration Clinic, where I am supervised by Professor Rebecca Sharpless, a licensed attorney in good standing in the state of Florida.
2. I interviewed the declarant, Maikel Betancourt, over Skype. Out of necessity in light of the COVID-19 pandemic, I signed Maikel Betancourt's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposable vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are

prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.

4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am unable to travel to visit Maikel Betancourt under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.
5. In light of the above, to protect public health, I am not able to travel to the Broward Transitional Center in Pompano Beach, Florida, to obtain Maikel Betancourt's signature.
6. I spoke with Maikel Betancourt via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Maikel Betancourt has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10, 2020 at Miami, Florida.

Meredith Hoffman

Meredith Hoffman

DECLARATION OF RENE JONATHAN ROSAS CARDENAS

I, Rene Jonathan Rosas Cardenas, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 27 years old, and I am from Cuba.

3. I am currently detained at Broward Transitional Center in Pompano Beach, Florida. I have been detained here since March 26, 2019, but have been detained in ICE custody for a very long time--since January 9, 2019.

4. I was transferred to BTC after being detained in multiple different detention facilities, including Alexandria Detention Center, Catahoula Detention Center, Adams County Detention Center, La Salle Detention Facility, River Correctional Center, Tallahatchie County Correctional Center, and Rio Grande Detention Center.

5. I'm eligible for my residency Cuban Adjustment Act since I have been in the country for more than one year but immigration won't release me.

6. I have chronic gastritis, and sometimes I have severe headaches. I fear that my precarious health condition makes me more vulnerable to coronavirus.

7. Conditions are very crowded in Broward Transitional Center. I sleep with five other men in my room in bunkbeds. We are about one meter from each other when we eat in the dining room, in chairs that are attached to the floor, and about one meter from each other while sleeping in bunk beds. When we eat, when we sleep, and when we use the phones we are always closer than 6 feet away from each other.

8. I try to wash my hands constantly, but sometimes there is not even

enough soap available to me.

9. I am concerned about the lack of hygiene at BTC. Detained men prepare the food that we eat at BTC. The detainees also do the cleaning. Some men wear gloves and masks when they prepare the food, but others do not. Some men wear gloves and masks when they clean but others do not. I only get gloves when I clean my room, and no other times. I do not receive a mask, and masks and gloves are not available to purchase in the commissary.

10. We have not received any training on hygienic measures to limit spread of infectious disease while completing these tasks.

11. I have not seen the staff in the facility use masks, and I have only sometimes see them use gloves. They do not use any other protective gear in the facility when they are with me. I do not see staff regularly washing their hands.

12. I entered this facility two weeks ago and was not put into isolation or any type of quarantine. They only gave me a regular check-up, and took my temperature.

13. In the beginning of this year, I had the flu when I was in Adams County Detention in Mississippi. I was very sick and had a high fever, and I was put into isolation for four days and only given ibuprofen but I did not receive other attention. Finally, my condition got so bad that I had to go to the hospital. The lack of attention to my flu makes me nervous about our treatment if a coronavirus breakout occurs.

14. The facility has not taken measures to educate us or announce precautions to protect us from coronavirus. I currently know of at least two rooms of men quarantined but staff have not explained to us the reason. The staff have not taught us about washing our hands or social distancing. I've only learned about this through the TV.

15. I am not sure if there are sick people in the detention center. I only

know that men are quarantined as a group.

16. I have not seen any more doctors or medical attention because of the coronavirus.

17. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

18. If released from detention I would live with Richard Munoz de Monte, a lawful permanent resident and my lifelong friend, who has space for me in his home in Miami, Florida, to be in isolation and maintain social distancing.

19. I have authorized Meredith Hoffman, a law student at the University of Miami School of Law, 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.

Meredith Hoffman

Meredith Hoffman, on Behalf of Rene Jonathan Rosas Cardenas

CERTIFICATION

I, Meredith Hoffman, declare that I am proficient in the English and Spanish languages.

On April 9, 2020, I read the foregoing declaration to Rene Jonathan Rosas Cardenas, and orally translated it faithfully and accurately into Spanish in the

presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 9, 2020.

Meredith Hoffman

Meredith Hoffman

LAW STUDENT DECLARATION

I, Meredith Hoffman, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Meredith Hoffman. I am a law student in the University of Miami School of Law Immigration Clinic, where I am supervised by Professor Rebecca Sharpless, a licensed attorney in good standing in the state of Florida.
2. I interviewed the declarant, to Rene Jonathan Rosas Cardenas, over Skype. Out of necessity in light of the COVID-19 pandemic, I signed Rene Jonathan Rosas Cardenas's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are

prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.

4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am unable to travel to visit Rene Jonathan Rosas Cardenas under a state ‘Stay at home’ order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.
5. In light of the above, to protect public health, I am not able to travel to the Broward Transitional Center in Pompano Beach, Florida, to obtain Rene Jonathan Rosas Cardenas’s signature.
6. I spoke with Rene Jonathan Rosas Cardenas via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Rene Jonathan Rosas Cardenas has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020 at Miami, Florida.

Meredith Hoffman
Meredith Hoffman

DECLARATION OF GELBER SONTAY FUNEZ

I, Gelber Sontay Funez, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I was born on December 18, 1996, in Guatemala.
3. I am currently detained at Broward Transitional Center in Pompano Beach, FL. I have been detained here since October of 2019.
4. I am married, have no children, and had recently withdrawn my appeal to the Board of Immigration Appeals so that I could be expeditiously deported to my home country of Guatemala.
5. I have been detained at the Broward Transitional Center on or around October 28 2019. I have no criminal issues other than a incident regarding fishing but that was resolved. I got detained when an officer came to my house looking for another person and asked for my immigration status. I was told that my appeal would go faster if I was detained.
6. On February 7, 2020, I withdrew my pending appeal because I could no longer withstand the situation at the Broward Transitional Center. I didn't understand what was happening but I now know that the Board of Immigration Appeals took until March 17, 2020 to withdraw my appeal. I regret withdrawing my appeal for the hope of getting out of detention as now I have been in limbo for 2 months.
7. Since then my deportation has not occurred. I have been told that it would happen soon and I was even fingerprinted for departure on April 7, but then yesterday, on April 7, I was told that it was cancelled

due to Holy Week.

8. I had heard from other detainees that Guatemala was not accepting flights.
9. I have been sharing a room with 5 other men for all these months. One of the men in my room until 3 days ago was sick and coughing. 3 days ago, I was moved away from my room to make room for new people arriving at BTC. They told us they were bringing a group of Cubans from Louisiana and a group of people from Krome. I know there were some other new people but I do not know where they came from.
10. Our room is very small and all of us share a bathroom and touch the same doors and handles. On weekdays we are given some supplies to clean our rooms and one single pair of gloves for all of us. There is some perfumed liquid to help us clean but I do not think it is disinfectant. They do not leave any supplies for us to keep cleaning our rooms after the fact and we do not have any wipes or disinfectant except for when they come by to have us clean our rooms. One of us has to clean the whole room for everyone each time because there is only one pair of gloves.
11. We get allotments of soap and personal cleaning supplies but we only get four packets of soap for the whole week. I used to buy more from commissary but my wife has lost her job in a restaurant due to the COVID pandemic, so she cannot help me put more money in my commissary for more supplies. I used to also buy extra food to make up for the bad and little food they give us but I can't do that as much now.
12. Detainees prepare all our meals and do any cleaning. One day the detainees did not want to go cook so the guards went around offering

everyone the job of cooking in the kitchen for \$2.00.

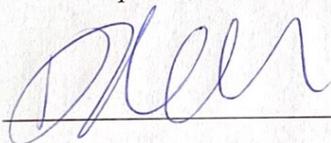
13. I have not seen anyone mop the common areas and the railings are only wiped once a day. We all are still getting in line together 3 times a day to get our meals. They have spaced out the seats in the dining area, but you are still very close to the person across from you at your table when you are eating.
14. They have told us we should wash our hands but we do not have any more supplies or access to cleaning supplies during this emergency. We all have seen the news and we are very scared and anxious about what is happening. We are worried for our families and friends outside and also for ourselves because we know that if anyone has it we will all get it as we can't move away from the sick people.
15. I feel difficulty and pain breathing and feel congested. I feel extremely anxious and depressed and I keep feeling dizzy and like I want to faint. Due to this situation, I have difficulty sleeping at night and have nightmares. There are many people that have fainted, and they have been taken away from BTC when that happens.
16. There is no new medical staff. A week or two ago I was feeling sick and they gave me some medicine that just made me feel very groggy and I could barely get out of bed. I haven't gone back or asked for any more medicine because I don't know what they gave me and it made me feel very bad. I have not been given a COVID-19 test and I don't know if any of the new people coming in have been tested. Some of them said that they took their temperatures when they were coming over. No one has taken my temperature lately.
17. No guards are wearing masks or gloves when dealing with us or when they come in to check our rooms. The guards go from room to room

and touch our doors and open our bathrooms to see if there is anyone in there. There are a few guards that are wearing gloves and masks and those are the guards taking care of 2 rooms that are quarantined because they are sick. Those guards take them food and they take them out of their rooms when we are all in our rooms.

18. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.
19. I would go live with my sponsor or my wife if I can be released. We would just stay in the house and not go out except for to get some food to survive off of. I want to be together with my immediate family and avoid getting sick as long as possible.
20. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 8, 2020.



Kristie-Anne Padron, on behalf of Gelber Sontay Funez

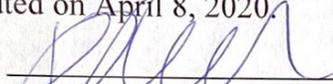
CERTIFICATION

I, Kristie-Anne Padron declare that I am proficient in the English and Spanish languages.

On April 8, 2020, I read the foregoing declaration to Gelber Sontay Funez and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 8, 2020.



Kristie-Anne Padron

ATTORNEY DECLARATION

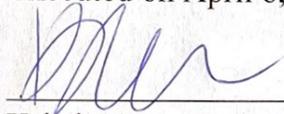
I, Kristie-Anne Padron, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Kristie-Anne Padron. I am a licensed attorney in good standing in the states of Florida and Massachusetts.
2. I represent the declarant, Gelber Sontay Funez, in his immigration case. Out of necessity in light of the COVID-19 pandemic, I signed Gelber Sontay Funez's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am self-isolating in Miami-Dade County, Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Broward Transition Center in Pompano Beach, Florida, to obtain my client's signature.
6. I spoke with Gelber Sontay Funez via Skype two times on April 8, 2020, read him the statement, and confirmed the accuracy of the information therein.
Gelber Sontay Funez has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 8, 2020 at Miami, Florida.



Kristie-Anne Padron, on behalf of Gelber Sontay Funez
Managing Attorney
Catholic Legal Services

DECLARATION OF MAYKEL VALERA RAMIREZ

I, Maykel Valera Ramirez, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 39 years old and I am from Cuba.

3. I am currently detained at Broward Transitional Center in Pompano Beach, Florida. I have been detained here since March 20, 2020. Before I was detained in Port Isabel, Texas. I have been detained since December 2019, and previously was awaiting for my asylum hearings in Mexico for nine months because I was in the Migrant Protection Protocols.

4. I have a daughter in Cuba and a wife from whom I am separated who lives in Palm Beach, Florida. I applied for asylum and missed my second court hearing because I was kidnapped while I was in Mexico, which was where I was waiting for the hearing under MPP. I was held hostage by them for over two months, and finally I escaped and ran to cross the bridge to enter Brownsville, where I was apprehended by ICE. Since the judge had already ordered me deported for missing my court hearing, I have a final order of deportation. I tried to reopen my asylum case, but the judge denied me.

5. I have hypertension, which makes me very afraid because I am more vulnerable to dying if I contract the coronavirus.

6. I sleep in a room with five other men in bunkbeds, and we are right next to each other. We also are also very close together when we eat in chairs that are attached to the floor. The people I sit across from at the table are right in front of me and there is not a safe distance between us. When we go out to the recreation

area, we are also all together very close together, with hundreds of people in the same space. As we wait to enter the dining hall we are all right next to each other waiting in line.

7. The dispensers for liquid soap in the dining hall are almost always empty. We receive liquid soap once a week, but it is not enough to last us through the week to wash our hands and to bathe as well. I share a shower with five other men, and it gets very dirty. I try to wash my hands as much possible, but many times I have to wash my hands with water only because there is not enough soap.

8. The detainees prepare the food and do the cleaning in the facility. They tend to wear masks and gloves while preparing the food but not masks while cleaning, and sometimes they do not wear gloves while cleaning. We have not received training on hygiene measures in order to limit spread of infectious disease while completing these tasks. If you run out of your bottle of soap you have to pay to purchase more. It is not possible to buy gloves or masks. I do not have money for the commissary, so I try to use the smallest amount of my liquid soap possible to make it last.

9. I have not seen the guards wearing masks or gloves. Just today we saw some put on masks, but before today I never saw the guards wear them. Just moments ago, I saw a woman doing cleaning who was not wearing gloves. I have seen nurses and other officials here not wearing gloves or other protective gear. This concerns me a lot. I do not see the staff washing their hands regularly. The guards do pat downs of the detainees without using gloves or masks. They also retrieve more bathroom supplies for us by touching them with their hands without gloves.

10. I just entered BTC a few weeks ago and since entering I have seen many more people brought into the facility. When I arrived in the facility I had a cold and very bad cough, but I was not put into isolation or given a test for

COVID-19.

11. Because I entered with a bad cold and cough, I needed to see a doctor, but I had to insist multiple times that I needed medical help before the doctor would see me. My cough was unbearable. I submitted a written request and went two times to the doctor's office without them attending me. Finally, I went to a guard who took me to the office to see a doctor.

12. The facility has not taken measures to educate us about COVID-19. What I know about coronavirus is from watching TV. There are some detainees who are quarantined but we have not been told the reason.

13. I know that people here have been coughing and having flu-like symptoms. Last night while I was waiting to enter the dining hall for dinner, a man right in front of me was coughing constantly. I was speaking with another man last night who was talking to me about feeling sick, that his body hurt and he was having trouble breathing. We hope he does not have the coronavirus.

14. I have not seen an increase in doctors or medical help because of the coronavirus. I usually would go to the doctor in the morning and in the evening to take my blood pressure medicine, but this week she gave me the whole bottle to take on my own. When I asked her why, she explained that more sick people were in the facility, so she no longer had the time to give me my medicine regularly.

15. Despite my vulnerabilities to COVID-19, no member of the medical staff has evaluated my conditions or well-being to determine whether any additional precautionary measures are necessary to protect me from the illness. I am scared for my life.

16. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

17. If released, I would live with my cousin, Belkis Ramirez, in her house

on 907 W Henry Street, Pasco, Washington, 99301. She has a separate bedroom with its own bathroom prepared for me so I could socially distance and isolate myself.

18. I have authorized Meredith Hoffman, a law student from the University of Miami School of Law, 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 10, 2020.

Meredith Hoffman

Meredith Hoffman, on Behalf of Maykel Valera Ramirez

CERTIFICATION

I, Meredith Hoffman, declare that I am proficient in the English and Spanish languages.

On April 10, 2020, I read the foregoing declaration to Maykel Valera Ramirez, and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 10, 2020.

Meredith Hoffman

Meredith Hoffman

LAW STUDENT DECLARATION

I, Meredith Hoffman, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Meredith Hoffman. I am a law student in the University of Miami School of Law Immigration Clinic, where I am supervised by Professor Rebecca Sharpless, a licensed attorney in good standing in the state of Florida.
2. I interviewed the declarant, Maykel Valera Ramirez, over Skype. Out of necessity in light of the COVID-19 pandemic, I signed Maykel Valera Ramirez's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.

4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am unable to travel to visit Maykel Valera Ramirez under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.
5. In light of the above, to protect public health, I am not able to travel to the Broward Transitional Center in Pompano Beach, Florida, to obtain Maykel Valera Ramirez's signature.
6. I spoke with Maykel Valera Ramirez via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Maykel Valera Ramirez has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 10, 2020 at Miami, Florida.

Meredith Hoffman

Meredith Hoffman

DECLARATION OF ADRIAN SOSA FLETES

I, Adrian Sosa Fletes, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I am 25 years old and I am from Cuba.
3. I am currently detained at Broward Transitional Center in Pompano Beach, Florida. I have been detained since March 9, 2019.
4. I am eligible to apply for a Green Card under the Cuban Adjustment Act because I have been in the United States for longer than one year.
5. I suffer from chronic pain and discomfort in my throat and I am a former smoker from my time in Cuba.
6. Each cell has six people living close to each other. During our meals, we sit directly next to each other. When we sleep, we are less than a meter from each other. There is no possible way to stay six feet away from cellmates.
7. Detainees are only given a small amount of soap every week. The soap lasts only one or two days before we run out and have to wait until we get soap again. This means that for the majority of the week we cannot wash our

hands because we do not have enough soap. We cannot purchase any hand sanitizer from commissary.

8. The detainees at Broward Transitional Center prepare meals and also are in charge of cleaning the common spaces. I have not seen any detainees wear gloves or a face mask when they clean. I have not observed any training on personal protective gear to limit the spread of diseases while cleaning. I have money in my commissary account, but I have not seen any masks, gloves, or hand sanitizer for purchase.
9. I have not seen the staff at the detention center not wear any protective gear and I have not seen the staff wash their hands.
10. Over the past week, about forty new detainees have arrived from Krome Service Processing Center. None of these detainees have been quarantined since they arrived. I am very worried about my risk of being infected by COVID-19, especially because we have heard that there were infected detainees in Krome Service Processing Center.
11. I have not heard, seen, or received any announcements, quarantines, or formal education on hand hygiene or social distancing at Broward Transitional Center. I have seen detainees who have symptoms associated with the coronavirus, pain in the throat, difficulty breathing, and coughing. I

have not seen the staff take any measures to treat these individuals or to protect the other detainees from them.

12. There have been no tests to see whether detainees have the coronavirus even though multiple people are showing symptoms.

13. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

14. If released, I would live at 2308 Enfield Court, Orlando, Florida, 32837 with my cousin, Yaima Marante Hernández. While living there, I would follow all recommendations issued by the Center for Disease Control and Prevention and the Florida Department of Health, practice social distancing, and self-quarantine.

15. I have authorized Jacob Morse, a law student at the University of Miami School of Law, to sign on my behalf because of the difficulty of arranging visitation and travel in light of the COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.

A handwritten signature in cursive script that reads "Jacob Morse". The signature is written in black ink and is positioned above a horizontal line.

Jacob Morse, on behalf of Adrian Sosa Fletes

LAW STUDENT DECLARATION

I, Jacob Morse, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Jacob Morse. I am a law student in the University of Miami School of Law Immigration Clinic, where I am supervised by Professor Rebecca Sharpless, a licensed attorney in good standing in the state of Florida.
2. I interviewed the declarant, Adrian Sosa Fletes, over Skype. Out of necessity in light of the COVID-19 pandemic, I signed Adrian Sosa Fletes's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of

infection when traveling. In addition, I am unable to travel to visit Adrian Sosa Fletes under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Broward Transitional Center in Pompano Beach, Florida, to obtain Adrian Sosa Fletes's signature.
6. I spoke with Adrian Sosa Fletes via Skype video call, read the declaration to him, and he confirmed that the information therein is accurate.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 9, 2020.

A handwritten signature in cursive script that reads "Jacob Morse". The signature is written in black ink and is positioned above a horizontal line.

Jacob Morse, on behalf of Adrian Sosa Fletes

DECLARATION OF ALEJANDRO FERREIRA BORGES

I, Alejandro Ferreira Borges, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 25 years old and am from Cuba.

3. I am currently detained at Broward Transitional Center in Pompano Beach, Florida. I have been detained here since March 20, 2020, and before this I was detained in Stewart Detention Center. I have been in detention almost one year, since April 26, 2019.

4. I have a wife in the U.S. who is currently living in Virginia and is applying for asylum. This month, I will be eligible to apply for a Green Card under the Cuban Adjustment Act, since I will have been in the U.S. for one year.

5. I have asthma and must use my inhaler four or five times a day. I also have high blood pressure. I am very afraid that the coronavirus will be fatal for me because of my asthma and blood pressure, because these both make me more vulnerable.

6. My living situation is very crowded and has problems with remaining clean and hygienic. I share a room with five other men. We sleep right next to each other and under each other in the bunk beds, in a room that's about 3 square meters.

7. We also eat very close to each other in chairs that are stuck to the floor.

8. When we can go outside, we are crowded together, about 800 people together in a small space. Everyone uses the same phone and has to sit together in

the same tables. It is also not possible to be far from each other when we sleep or eat. The social distancing rules of 6 feet apart are not respected here.

9. I share my shower with five other men, and it is often dirty. I am often not able to wash my hands with soap, only with water, because we only receive small bottles of shower gel to bathe and that is not enough also to last for hand washing.

10. The detainees here prepare the food, and the glasses we receive to drink out of with our meals are very dirty. The detained men also do the cleaning of the main areas, the phones, and other parts of the detention center. I clean my room and bathroom. The detainees wear gloves and masks sometimes but other times they do not when they are cleaning or preparing food. I have not received a mask or gloves or any other protective gear while cleaning or doing other tasks.

11. We have not gotten any type of training on how to be hygienic or to prevent the spread of infectious disease while completing these tasks. Only about a week ago, staff put up some signs saying to wash your hands and to stay six feet away from each other.

12. It's not possible to buy masks or gloves in the commissary.

13. Some ICE staff are wearing gloves, but others are not. I do not see them wearing masks, and I do not see them regularly wash their hands. They use their bare hands to touch our telephones, tables, our exercise equipment, our volleyball and basketball, and the doorknobs. They also open and close the doors to the shared bathrooms without wearing gloves. Sometimes they use their bare hands to give the detainees high fives to greet them.

14. I only entered BTC a few weeks ago, and I have already seen at least 40 more people brought into the facility. When I entered, the staff put me into a shared room without putting me into isolation first. This makes me afraid because I know it's possible to have coronavirus and to spread it without having visible

symptoms.

15. Here at BTC I told the doctor I was having problems breathing because of my asthma. I had to wait to see the doctor, who gave me an inhaler. My asthma has grown worse since I entered ICE detention last year. I have seen other people request medical help but not receive it until it becomes an emergency.

16. The facility has not made announcements about COVID-19, but has recently put up some papers saying to wash our hands and to keep at a safe distance. I am worried about using the same glasses as people, about not having soap, and about the lack of hygiene in the facility. I know of several people who are in quarantines, but we have not been told the reason. The same staff who interacts with them comes back to our spaces and interacts with us.

17. I have seen various people with cough in the detention center, and these people are not under quarantine.

18. I have not seen any increases in medical help during the coronavirus. When you go to the doctor, the doctor usually just gives people ibuprofen and sends them away.

19. Despite my vulnerabilities to COVID-19, no member of the medical staff has evaluated my conditions or well-being to determine whether any additional precautionary measures are necessary to protect me from the illness. I am scared for my life.

20. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

21. If released I would live Ebelio Borges, my uncle, who is an American citizen, in Palm Beach, Florida. He has his own house and a separate room prepared for me where I could isolate and socially distance.

22. I have authorized Meredith Hoffman, a law student at the University

of Miami School of Law, 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 9, 2020.

Meredith Hoffman

Meredith Hoffman, on Behalf of Alejandro Ferreira Borges

CERTIFICATION

I, Meredith Hoffman, declare that I am proficient in the English and Spanish languages.

On April 10, 2020, I read the foregoing declaration to Alejandro Ferreira Borges, and orally translated it faithfully and accurately into Spanish in the presence of the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on April 9, 2020.

Meredith Hoffman

Meredith Hoffman

LAW STUDENT DECLARATION

I, Meredith Hoffman, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Meredith Hoffman. I am a law student in the University of Miami School of Law Immigration Clinic, where I am supervised by Professor Rebecca Sharpless, a licensed attorney in good standing in the state of Florida.
2. I interviewed the declarant, Alejandro Ferreira Borges, over Skype. Out of necessity in light of the COVID-19 pandemic, I signed Alejandro Ferreira Borges's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am unable to travel to visit Alejandro

Ferreira Borges under a state ‘Stay at home’ order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Broward Transitional Center in Pompano Beach, Florida, to obtain Alejandro Ferreira Borges’s signature.

Meredith Hoffman

Meredith Hoffman

DECLARATION OF ERVIN DAVID RODAS PEDRO

I, Ervin David Rodas Pedro, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.

2. I am 28 years old and a Guatemalan national.

3. I am currently detained at Broward Transitional Center in Pompano Beach, Florida.

4. I am married and my wife is a United States citizen.

5. I suffer from asthma and recently I have had a lot of difficulty breathing. I was seen by a nurse after 4 requests for medical assistance.

6. I was eventually given an inhaler to assist with my difficulty in breathing.

7. Aside from the detainees in our detention, they have brought in over 24 detainees from Krome Service Processing Center in the past days. We have been told by guards that Krome Service Processing Center has had at least one confirmed case of COVID19 from a detainee and a couple from guards. We were told the infected people went home.

8. We are given soap only, no hand sanitizer. If one would like to buy some additional items, one can purchase at the commissary; however, I do not have funds to spend on these items.

9. I have observed the guards wear gloves sometimes, especially when they are searching detainees. However, they remove them immediately after. I have not seen many guards wearing masks. The guards have access to and touch any areas they wish without gloves or masks.

10. I have not received any instruction regarding safety measures in light

of COVID19.

11. I have observed the common areas be cleaned once a day. Other detainees perform the cleaning and they wear gloves while cleaning. I have not seen them wear masks.

12. If you would like to wash your hands, you need to go back to the wash area. There are no additional hand sanitizer containers to disinfect our hands.

13. I am not able to keep social distancing of 6ft during most times, especially during meals times, where everyone is in very close proximity to one another; about 2-3 ft away.

14. Other detainees cook and serve meals. They wear gloves for the most part while performing these activities, however I have no seen most of them with masks.

15. I have not observed higher than usual cleaning or medical presence in response to COVID19.

16. I am afraid that I am being placed in constant risk without being able to protect myself. I cannot observe the measures dictated by the CDC of social distancing, wearing masks or increased cleaning. These are all measure that are needed in order to protect me from the illness, especially considering that I am an at-risk population due to my underlying medical condition.

17. If I am released from detention, I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

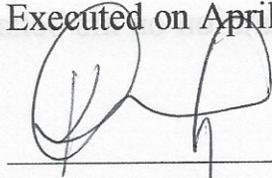
18. If released, I will go live with my United States citizen wife and will abide by and observe any and all health recommendations made by the Centers for Disease Control and any other local authorities.

19. I have authorized my attorney 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 declare under penalty of perjury that the things described above are true and correct.

Executed on April 11, 2020.



Kenia Garcia

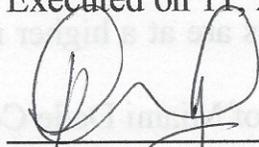
CERTIFICATION

I, Kenia Garcia, declare that I am proficient in the English and Spanish languages.

On April 10, 2020, I read the foregoing declaration to Ervin David Rodas Pedro and orally translated it faithfully and accurately into Spanish to the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

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

Executed on 11, 2020.



Kenia Garcia

ATTORNEY DECLARATION

I, Kenia Garcia, declare the following under penalty of perjury pursuant to 28 U.S.C.

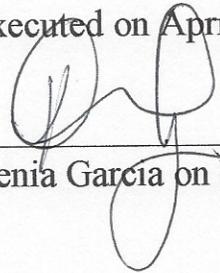
§ 1746:

1. My name is Kenia Garcia. I am a licensed attorney in good standing in the state of Florida.
2. I represent the declarant, Ervin David Rodas Pedro, in his immigration case in Pompano Beach, Florida. Out of necessity in light of the COVID-19 pandemic, I signed Ervin David Rodas Pedro's declaration on his behalf and with his express consent.
3. ICE is now requiring legal visitors to provide and wear personal protective equipment, including disposably vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Miami Dade County, Florida and unable to travel to visit my client under a state 'Stay at home' order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Broward Detention Center in Pompano Beach, Florida, to obtain my client's signature.
6. I spoke with Ervin David Rodas Pedro via phone call, read the declaration to him, and confirmed the accuracy of the information therein. Ervin David Rodas Pedro has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 11, 2020 at Miami, Florida.



Kenia Garcia on behalf of Ervin David Rodas Pedro