

DECLARATION OF BENJAMIN OSORIO

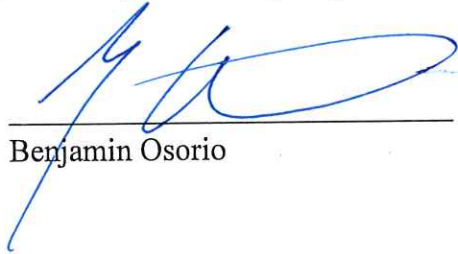
I, Benjamin Osorio, make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I am an attorney and a partner at Murray Osorio, PLLC.
2. I have represented individuals confined in immigrant detention centers across the country and currently represent a client detained at the Irwin County Detention Center (“Irwin”) in Ocilla, Georgia.
3. I represent the Irwin client in her individual immigration case. Her final hearing was scheduled for April 23, 2020, but the hearing was cancelled after the Atlanta Immigration Court closed for several days when one of the staff was diagnosed with Covid-19. We are currently awaiting a rescheduled date for the hearing.
4. In preparation for the filing, I have conducted several video teleconference (“VTC”) meetings with the client to prepare her, including on February 4 and 20, on March 18, and on April 8, 17, and 21 of 2020.
5. In all of these VTC legal visits, I have observed Irwin staff coming and going from the VTC room, compromising the confidentiality of the meeting. At times, guards have sat in the back of the VTC room while I have discussed case preparations with the client.
6. The presence of facility staff during VTC legal visits has impacted in my ability to speak freely with my client, caused delay in the preparation of her case due to delayed discussion of sensitive topics, and impeded on my ability to simply hear my client due to constant disruptions and background noise caused by the entry and exit of the staff.
7. I have had difficulty getting VTC legal visits arranged at Irwin. For example, on April 15, 2020, I requested a VTC legal visit for April 21 to finish preparing my client for her individual hearing scheduled for two days later, on April 23. Despite several emails to Irwin requesting the VTC appointment, I received no confirmation and was unaware if the meeting would be moving forward. Fortunately, my client’s husband advised me on the morning of April 21 that the appointment had been confirmed to the client for 2 PM later that day. The failure to provide notice to immigration attorneys of when VTC appointments are scheduled makes it difficult to effectively communicate with my client and properly meet my ethical obligations to my client if I cannot count on having access to her.

8. Prior to Covid-19, I have met with clients at Irwin in-person to prepare the clients for their final hearings. Because of a number of factors, including local and state directives on social distancing, ICE's requirements for attorneys to procure personal protective equipment (which is in short supply), and in order to limit exposure, I proceeded with preparation for this client's individual hearing via VTC.

I declare under penalty of perjury and under the laws of the United States, pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, memory, and belief.

Executed on the 28th day of April, in the year 2020, in the city of Fairfax, Virginia.



Benjamin Osorio