

**Declaration of Dr. Pedro J. Greer, Jr.**

I, Dr. Pedro J. Greer, Jr., 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:

**I. Background and Qualifications**

1. My name is Pedro J. Greer, Professor of Medicine, Founding Chair of Humanities, Health, and Society and Associate Dean for Community Engagement at Florida International University Herbert Wertheim College of Medicine (FIU HWCOC) in Miami, Florida. Throughout my career, I have been an advocate for health equity by engaging communities to create effective health and social policies and accessible health care systems.
2. I have worked for the past 36 years as a physician, from Resident to Internist, Gastroenterologist and Hepatologist, Department Chair and Associate Dean.
3. My bio, attached as Exhibit A, includes a brief description of my education and relevant experience.
4. My C.V. includes a full list of my honors, experience, and publications, and it is attached as Exhibit B.
5. I am donating my time reviewing materials and preparing this report. Any live testimony I provide will also be provided *pro bono*.
6. I have testified as an expert at trial or by deposition in the past four years, in a federal case involving homeless sex offenders.
7. It is my understanding that immigration detainees in South Florida are currently held at three facilities, Glades County Detention Center (Glades), Krome Service Processing Center (Krome), and Broward Transitional Center (BTC). Glades is a county jail, which houses immigration detainees pursuant to an inter-governmental service agreement with Immigration and Customs Enforcement (ICE). Krome is owned by ICE, although daily operations are contracted out to a private company, Akima Global Services. BTC is a private facility operated by the GEO group pursuant to an ICE contract. These facilities are generally indistinguishable from other jails and prisons.