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*Pseudonyms

From: [Elanie Cintron](mailto:Elanie.Cintron)
To: megan.mack@hq.dhs.gov; john.roth@oig.dhs.gov
Cc: scott.shuchart@hq.dhs.gov; zachary.bromer@hq.dhs.gov; drew.oosterbaan@oig.dhs.gov; crclcompliance@hq.dhs.gov
Subject: Treatment of Vulnerable Detainees at Irwin County Detention Center
Date: Wednesday, August 03, 2016 11:15:31 AM

Dear Ms. Mack and Mr. Roth:

I write as counsel for [REDACTED] and [REDACTED] [REDACTED] to express serious concerns regarding the treatment these extremely vulnerable asylum seekers and trauma survivors have received at the Immigration and Customs Enforcement (ICE) Irwin County Detention Center.

Mr. [REDACTED] and Ms. [REDACTED] are both asylum seekers who are survivors of severe trauma that is exacerbated by their prolonged detention. They both fled their home countries as children and sought safety in the United States, entering as unaccompanied minors. Both are now just eighteen years old. Ms. [REDACTED] is a victim of rape, domestic violence, and family-based persecution "since she first arrived in the United States, it has become even more dangerous for her to return to El Salvador. In December 2015, gang members struck her sister with their vehicle because she refused to disclose Ms. [REDACTED] whereabouts, and they continue to relentlessly threaten her remaining family members in El Salvador with death. Ms. [REDACTED] was arrested in Atlanta, Georgia as part of Operation Border Guardian. She now has an asylum application pending with USCIS as well as an appeal pending with the Board of Immigration Appeals.

Mr. [REDACTED] endured a traumatic childhood involving abuse, constant fear and sexual molestation. Mr. [REDACTED] fled Guatemala after spending years trying to escape the threats received by his family members as well as the child abuse he endured from his father, who is currently incarcerated in Guatemala after being accused and convicted of murder. The family of the victim seeks vengeance. As such, Mr. [REDACTED] fear of return to Guatemala is exacerbated. His only caretaker lives in the U.S. Mr. [REDACTED] was just seventeen years old when he fled from Guatemala and was kidnapped and subjected to forced labor with minimal food and water. He was sequestered for approximately ten days and was forced to work in an auto body repair shop. During that time, he was shown pictures of crocodiles eating the bodies of individuals who have defied or resisted to work and be submissive. As a result of this psychological and physical coercion, Mr. [REDACTED] is traumatized from this incident, as well as from his own history of child abuse.

Mr. [REDACTED] was also arrested in Atlanta, Georgia as part of Operation Border Guardian. He has a trafficking (T) visa application as well as an asylum application pending with USCIS and also has a motion to reopen pending

with the immigration court. He has now been detained at Irwin since December- for seven months. ICE has denied every request to release Mr. ██████████, even as an exercise of Prosecutorial Discretion.

Resort to and Threats of Solitary Confinement for Vulnerable Individuals and Inadequate Mental Health Treatment at Irwin

Ample research demonstrates the damaging psychological effects of solitary confinement including re-traumatization of victims of past abuse<!--[if !supportFootnotes]>[1]<!--[endif]>. President Obama himself has recognized that solitary confinement has the potential to lead to "devastating, lasting psychological consequences" and recently announced that federal prisons would no longer use it for juveniles or inmates serving time for low-level infractions.<!--[if !supportFootnotes]>[2]<!--[endif]>

The egregious resort to solitary confinement ("administrative segregation") for Ms. ██████████ (a survivor of rape and other violence) and the threatened resort to solitary confinement for Mr. ██████████ (a survivor of child abuse and trafficking) is an affront to civil and human rights "especially where, as here, they themselves were the *victims* of bullying and harassment by other detainees.

Ms. ██████████

In June 2016, Ms. ██████████ was subjected to three straight days of solitary confinement ("administrative segregation") at Irwin. Two other female detainees had accused her of being a lesbian, saying they saw Ms. ██████████ kiss another girl. They began teasing Ms. ██████████, so she told her deportation officer about it. His response was to place her in administrative segregation while they conducted an "investigation." This had a terrible effect on Ms. ██████████ mental health. She was held there for three days, in a room with just a bed and a toilet, and spent much of the time crying. When ICE finally let her out, she was called in to meet with the two female detainees who had teased her and an officer; the women apologized, but no explanation was given as to the need for segregation or the nature of the investigation that was undertaken in response to the incident.

The use of administrative segregation was deeply traumatizing to this 18-year-old survivor of rape and severe domestic violence in El Salvador and an inappropriate response to reporting verbal bullying by other detainees. ICE should have stepped in to end the bullying instead of taking the extraordinary step of placing Ms. ██████████ (the victim) in segregation.

The use of segregation further violated ICE's own directive on the subject, which clearly states that administrative segregation may only be used "when necessary" and, "in particular, placement in administrative segregation due to a special vulnerability [herein defined to include those "who would be susceptible to harm in general population due in part to their sexual orientation or gender identity"] should be used only as a last resort when no other viable housing options exist.<!--[if !supportFootnotes]>[3]<!--[endif]> There is absolutely no

indication that segregation was needed in this case to protect Ms. [REDACTED] or anyone else.

Ms. [REDACTED] continues to suffer from the psychological repercussions of administrative segregation. The solitary confinement she endured exacerbated her past trauma. Despite, numerous requests for mental health treatment, Ms. [REDACTED] has yet to receive any help for her trauma.

Mr. [REDACTED]

During his seven months of detention at Irwin, Mr. [REDACTED] has been teased by fellow detainees on numerous occasions because they think he is gay. He has made several complaints to his ICE deportation officer to no avail. On July 8, Mr. [REDACTED] was visited by a facility "counselor" and asked point blank if he is gay. He was taken aback. When he explained that he was struggling in detention, the "counselor" responded that she could arrange for him to be sent to administrative segregation. This further upset Mr. [REDACTED]. He is terrified that ICE will place him in administrative segregation, which he absolutely does not want.

While he wanted genuine help and mental health treatment from this counselor, all he received was intrusive questioning and the option of being placed in administrative segregation (as well as some pills for his headache).

Withholding Necessary Medication

In late December 2015, a nurse at Irwin told Mr. [REDACTED] that he had gastritis and he was given pills to take. He does not know the name of the medication they gave him. Then on or about April 22, 2016, Mr. [REDACTED], overheard ICE Officer [REDACTED] inform the nurse to stop giving Mr. [REDACTED] the medication because he was going to be deported and sent back to Guatemala. The nurse stopped giving Mr. [REDACTED] the medication for his gastritis. All he received in the interim was a cream called muscle rub.

Without his medication, Mr. [REDACTED] suffered. He continued to feel discomfort, and eating was difficult. He went hungry to avoid the discomfort.

On April 21, Mr. [REDACTED] filed an application for a T visa, receipt notice dated April 27. He also filed an asylum application, receipt notice dated May 10, 2016. Both of these applications are currently pending. A motion to reopen and a request for a stay of his removal are also pending with the Charlotte immigration court.

On or about May 9, Officer [REDACTED] took Mr. [REDACTED] to speak to a Guatemalan consular official. Mr. [REDACTED] asked the consular official if she could help him get his medicine. When the consular official then asked Officer [REDACTED] to please take him to the doctor, the ICE officer said, in a low voice, two words, "fuck asshole," and begrudgingly took Mr. [REDACTED] to medical. At

medical, Mr. ██████████ told the nurses and ICE that he needed someone to translate from English to Spanish for him, but they did not respond and did not translate. The consular official then further asked them three times to find an interpreter, but they did not. When Mr. ██████████ tried to tell them in English that he does not perfectly understand English, the officer told him to shut up, and two of them began making fun of him because he did not speak English. About fifteen days prior this, the same ICE officer told Mr. ██████████ that he no longer had an opportunity for anything and that nothing was going to stop his deportation " though ICE knew that this was not true. Mr. ██████████ felt that the officer was trying to make him feel that he should just give up so they could deport him. Despite his requests, Mr. ██████████ endured weeks without being provided his medication. This deprivation of medial treatment is not only detrimental, but also unjust and contrary to the detention standards that should be adhered to at the facility.

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Conclusion

We urgently request that you investigate these serious concerns with medical and mental health treatment, access to independent mental health professionals, and inappropriate use of administration segregation, both systemically and in these individual cases. I repeatedly emailed the Atlanta Field Office requesting the proper protocol for scheduling independent mental health evaluations for my clients at Irwin but, as of July 29, I have not yet received an answer from the Atlanta Field Office. Both detainees urgently need such evaluations to take place and are suffering severe psychological trauma in detention.

Further, I urgently request permission to schedule an independent mental health evaluation for both Ms. ██████████ and Mr. ██████████ and request the proper protocol for arranging such evaluations at the Irwin detention facility, including to whom the email should be addressed and what information the email must contain. An evaluation would help assess the need for individual treatment and would further assure that these individuals being receiving much needed treatment. Thank you for your time and attention to this matter.

<!--[endif]-->
Warm Regards,

Elanie J. Cintron, Esq.

LICHTER IMMIGRATION

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<!--[if !supportFootnotes]-->www.LichterImmigration.com

[1]<!--[endif]--> See, e.g., Stuart Grassian, “Psychiatric Effects of Solitary Confinement,” 22 Wash. U. J.L. & Pol’y 325, 328 (2006); Peter Scharff Smith, “The Effects of Solitary Confinement on Prison Inmates: A Brief History and Review of the Literature,” 34 Crime & Justice 1, 441-528 (2006); Craig Haney and Mona Lynch, “Regulating Prisons of the Future: A Psychological Analysis of Supermax and Solitary Confinement,” 23 N.Y.U. Rev. L. & Soc. Change 477 (1997); see also Physicians for Human Rights, National Immigrant Justice Center, and Heartland Alliance, *Invisible in Isolation: The Use of Segregation and Solitary Confinement in Immigration Detention* (September 2012), available at <https://www.immigrantjustice.org/publications/report-invisible-isolation-use-segregation-and-solitary-confinement-immigration-detenti>.

<!--[if !supportFootnotes]-->[2]<!--[endif]--> David Smith, “Crackdown on solitary confinement begins, but a culture of secrecy remains,” *The Guardian* (Jan. 28, 2016), available at <http://www.theguardian.com/us-news/2016/jan/28/solitary-confinement-prisons-barack-obama-albert-woodfox>.

<!--[if !supportFootnotes]-->[3]<!--[endif]--> U.S. Immigration and Customs Enforcement, “Review of the Use of Segregation for ICE Detainees,” September 4, 2013, available at <http://www.aila.org/infonet/ice-use-of-segregation-detainees>.

NAME:	Claudia Rodriguez de la Torre
AGE AT TIME OF DETENTION:	35-38
COUNTRY OF ORIGIN:	Mexico
GENDER IDENTITY:	Female
NAME OF FACILITY:	Eloy Detention Center
DATES INDIVIDUAL WAS DETAINED AT FACILITY:	January 15, 2014 to present
TOPICS COVERED IN COMPLAINT (MEDICAL, DUE PROCESS, SAFETY, ETC.):	Safety

I swear under penalty of perjury that the following statements are true and accurate to the best of my knowledge.

1. My name is Claudia Rodriguez de la Torre.
2. I have been detained at the Eloy Detention Center since January of 2014, two years and eight months.
3. Detention has been extremely difficult for me, but I continue to fight my removal because of my three sons, ages 12, 10 and 8, who were all born in the United States. I do not want to be separated from them.
4. I have seen many injustices while detained at this facility, relating to lack of medical care, the use of segregation for mentally ill individuals, and unfair treatment and discrimination against LGBT individuals.
5. Almost from the time you are booked into Eloy, the message is sent that you are less than human. For example, for women, we receive clothing that is used and stained. I am sure that the facility is trying to save money but it is degrading and unhygienic to have to use undergarments that have been used by others and are soiled. Also, when you are booked into Eloy, you are given tennis shoes that wear out after about a month or so. Some people get shoes that are already used. This sometimes leads to infections for people.
6. On April 14, 2016, I suffered a serious injury at Eloy because the facility staff continually ignored or denied my requests for shoes in my size.
7. From about January 2014 to August 2015, I had to request new shoes about 8 or 9 times. Each time, I was given shoes that were a size and a half too big. I would try to raise the issue with the guards here at Eloy but they either ignored me or told me that I was not going to get shoes in my size.
8. I tried to make do with the shoes but at one point, my feet began to hurt very badly. I finally informed my attorney in August of 2015. My attorney then informed Immigration & Customs Enforcement (ICE). After that, I received shoes in my size on August 12. However, for reasons I cannot understand, I did not have access to my commissary for one month after that. I believe that I was penalized for making the complaint about shoes.
9. After about two months, the shoes I was given again wore out and again I was given new shoes that were a size and a half too big. I was afraid to raise the issue with my attorney because I was afraid that I would again be punished, so I just tried to live with the shoes.
10. In April of this year, I was trying to exercise to deal with the depression I have developed due to my detention. While in the recreation area, I stumbled on a crack in the pavement and lost my balance. I could not regain my balance since I was wearing shoes that were too big, one fell off and I fell, badly injuring the left side of my body, including my face, leg, arm and mouth. As a consequence of my fall, my tooth got chipped. The guards at Eloy have told me that neither Eloy nor ICE will cover the costs of repairing my tooth.
11. I have attached photos of the injuries I suffered from my fall.
12. After my fall, I received new shoes in my size. However, those have worn out and again, I was given shoes that are too big for me. I have found it is useless to continue asking.
13. I would like to add that we are human beings, but I feel that we are viewed only as criminals by the Eloy guards and treated as such. All human beings have rights and should be treated humanely. Yes, some of us have made mistakes, but it does not mean we should be denied basic necessities just because we are fighting to stay with our families or because we are afraid to return to our countries.

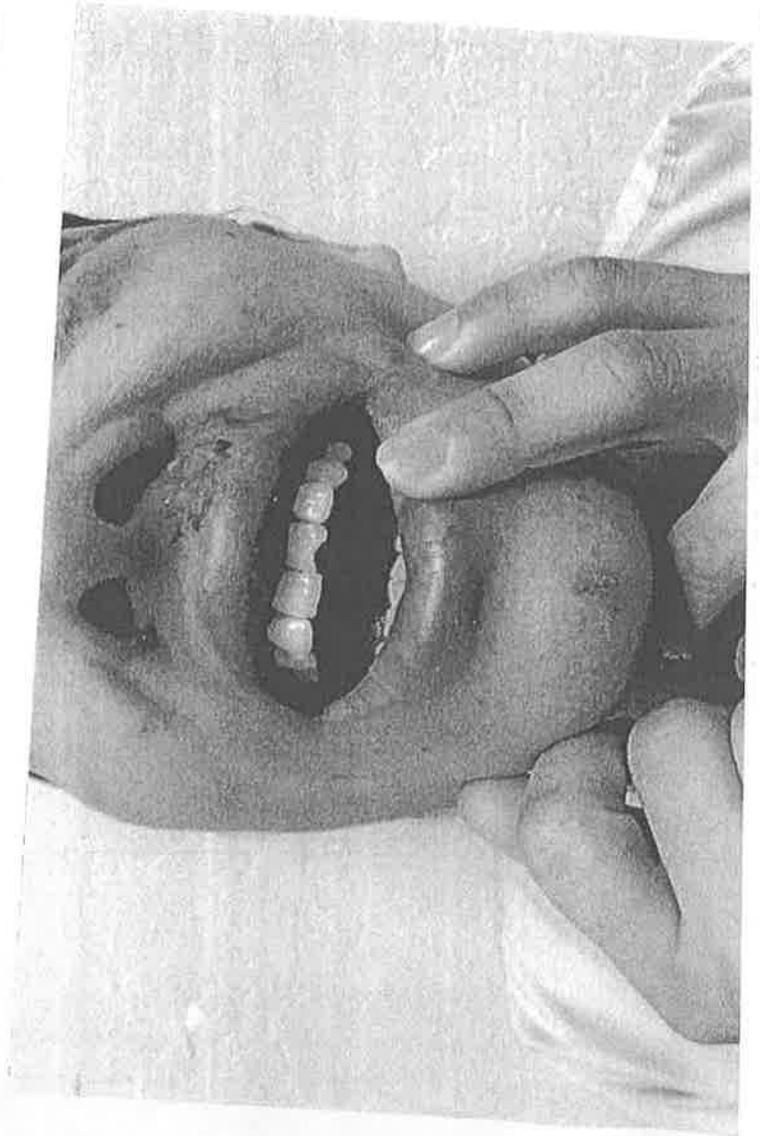
<i>Claudia Rodriguez de la Torre</i>	<i>10/09/16</i>
SIGNATURE	DATE

CERTIFICATION OF TRANSLATION

I, *Claudia Valenzuela*, certify that I am proficient in the English and Spanish languages and that the foregoing was read to *Claudia Rodriguez de la Torre* in Spanish.

<i>Claudia Valenzuela</i>	<i>10/5/16</i>
SIGNATURE OF TRANSLATOR	DATE





NAME:	Muhammad Nazry Mustakim
AGE AT TIME OF DETENTION:	31
COUNTRY OF ORIGIN:	Singapore
GENDER IDENTITY:	Male
NAME OF FACILITY:	South Texas Detention Center in Pearsall, Texas
DATES INDIVIDUAL WAS DETAINED AT FACILITY:	March 30, 2011 - February 7, 2012
TOPICS COVERED IN COMPLAINT (MEDICAL, DUE PROCESS, SAFETY, ETC.):	Labor exploitation, medical

I swear under penalty of perjury that the following statements are true and accurate to the best of my knowledge.

[body of declaration with numbered paragraphs]

1. My name is (Muhammad) Nazry Mustakim. I immigrated to the United States from Singapore in 1992. I am a legal permanent resident of the United States residing in Waco, Texas with my wife Hope and our children Ezra and Esther.
2. In 2007, I pled guilty to a non-violent drug possession charge that I was arrested for in 2005. After having successfully completed a 6 month rehabilitation program in 2006 and becoming a leader in my church and a full time college student, I received a 10 year probation sentence. I worked at My Brother's Keeper homeless shelter, graduated from college, volunteered at the Meyer Center for Urban Ministries, and became a full time employee at Mission Waco.
3. On March 30th, 2011, I was arrested by four armed ICE officers at my home in Waco, Texas while my wife Hope watched. I was taken to the South Texas Detention Center, a private prison in Pearsall, Texas. Eventually, I found out that ICE was trying to deport me because of my criminal conviction as a result of my plea deal.
4. The detention center I was taken to had thousands of detainees and was operated by private prison corporation GEO Group. I witnessed many injustices there. I slept in a cell/dorm with 100 other men. Every day we were awoken at 4:30am by GEO Group guards banging on our bunks and telling us we had to go to breakfast.
5. While detained, I worked in the kitchen and cleaned the "holding tank." It often appeared that the entire detention center was run by us detainees. We were paid \$3 per day by the private prison company to do the labor. In the kitchen, there are 20 detainees working for each of the four shifts, so a total of 80 detainees working in the kitchen. The detainees also filled roles such as barbers, laundry workers, and janitorial workers. Very few actual prison employees worked in these areas.
6. The private detention center was run like a prison. We were screamed at and yelled at by the guards. If you didn't listen or misunderstood instruction, the GEO guards would threaten to send you to solitary confinement. Once, I was on the phone and praying with wife Hope and trying to finish our call. We were running late, so a GEO sergeant came over and threatened to send me to solitary confinement.
7. Getting adequate medical care was nearly impossible. The medical staff prescribed Ibuprofen for nearly everything, whether you were sick with the flu or a cold or if you fell off your bunk. You had to put in a request for a band-aid even for an open burn wound (which I experienced first hand). Additionally, processing a request would take at least two days. One time, I fell playing basketball and was in a lot of pain. I put in a request and then went to the doctor at night, but the guard told him I had to wait because "I wasn't dying" and my pain level "was only an 8 out of 10."

	10/3/16
SIGNATURE	DATE

CERTIFICATION OF TRANSLATION

I, *[name of translator]*, certify that I am proficient in the English and Spanish languages and that the foregoing was read to *[declarant]* in Spanish.

SIGNATURE OF TRANSLATOR	DATE

NAME:	Anonymous
AGE AT TIME OF DETENTION:	44
COUNTRY OF ORIGIN:	El Salvador
GENDER IDENTITY:	Male
NAME OF FACILITY:	Otay Mesa Detention Center
DATES INDIVIDUAL WAS DETAINED AT FACILITY:	2006 - 2013
TOPICS COVERED IN COMPLAINT (MEDICAL, DUE PROCESS, SAFETY, ETC.):	Medical neglect, inadequate nutrition and inhumane conditions, verbal abuse and mistreatment by guards, malfeasance by guards, solitary confinement, prolonged detention

I swear under penalty of perjury that the following statements are true and accurate to the best of my knowledge. This statement was given in English and not translated:

On Medical Neglect:

1. While I was in detention, they did an operation on my tonsils and I don't know if pinched a nerve or what, or it was the wrong medicine. But now I have a problem when I eat, sleep and speak. They mixed up my medicine with someone who had similar name, I don't know how many times they did that. It happened at least six times. At one point, I told them I would not take the medicine anymore because it made me feel weird and it was someone else's medicine.
2. You have to collapse onto the floor before they will give you any medical attention. If you knock on the door, they don't take you to the doctor. Someone who had a hernia had to wait two weeks for medicine and they make you wait two weeks to do extractions or anything.
3. They would make us wait for four or six hours if you went to see the doctor. They did it to keep you from coming back and asking for help, to teach you not to ask for help.
4. I complained about pain in my jaw, but I was told that the dentist would only do extractions. I also had a shattered crown on one tooth, but I was left to keep eating like that and it was very painful. I lost teeth after detention. Three times I swallowed pieces of shattered crowns because I could not get medical attention for them.
5. They say they have a doctor and a psychologist there 24 hours a day, but that is not true, it is a lie. They don't even have regular medical doctor, they only have a nurse practitioner. And if they aren't there, they tell you you cannot have anything if you have pain at night time. After my operation, they were supposed to give me medicine for my pain, but they said they wouldn't give me anything unless the nurse practitioner there or

the pharmacy is closed. They are supposed to have medicine available, how can they leave you without medicine after an operation? We are human beings, even if you see an animal on the floor, you would do something for them. It is very inhumane the way they treat you there.

6. Since I've been out of detention, I've been seeing a doctor, psychologist and a speech therapist because of all of the problems I had in detention. I came out with itching all over my body and even on my private parts.
7. They tell you you'll get medical attention when you're deported.

On Inadequate Nutrition and Inhumane Conditions:

8. How is that legal to pay you \$1 a day? That is a violation of their own federal law. They make you sign a paper to agree to \$1 a day. They should pay at least a minimum. You can work 10 hours in the kitchen for that. It's a lot of work to make \$1. And the dollar comes back to them because they know you need to buy food from the commissary. They get free labor. That's like we are slaves for them because we work for \$1 so we can buy their commissary.
9. The food in detention gave me an infection.
10. The commissary is very expensive and they give you expired food. Even the meat and milk. Some of the milk when you open it is like cheese.
11. The place where they serve food is stinky, they are supposed to wash it but they don't. If they served us peanut butter on one day, you could find peanut butter on the plates from the day before. The plates were not washed. Some of the plates in there looked like they came from the bottom of the ocean.
12. I got a job in the kitchen, so I know that nothing was washed. Even if they did put it in the dishwasher, they are supposed to use a temperature of 120 to clean, but I never saw it over 80 or 81. The jets in the dishwasher did not work properly and had no pressure to remove the food.
13. When I showed the trays to a guard, I told him how much came out from a tray, they made us wash it with a metal sponge and that made it worse because it made scratches on the plastic. It made it so more food when in the scratches and all of the trays smelled. That's not the way to clean.
14. When they are going to have a tour for people coming into the detention center, they prepare to keep it in order and clean. But usually everything is dirty, but when they know some big guy or someone important is coming, they clean the walls, they fix the painting to make it look nice and seem like it's OK. They are there to do an inspection and I don't know how they can pass an inspection. Most of the officers don't eat the food there because they know it's dirty.

15. They are very stingy when giving you something to clean your self like shampoo or soap. Sometimes they don't even want to give you toilet paper. It's stuff you need every day, but they don't give you enough. For toilet paper, you have to bring the roll empty and they say that they don't have it and you just have to wait, even if you wait for hours.
16. The showers have mildew everywhere and I got fungus there and they removed my toenails because I have diabetes, it's very dangerous you can get amputation if you get an infection.
17. There were bed mites in the mattresses and I got scabbies two times while in detention. The mattress was cracked and the foam inside was turned to powder it was so old. All they did was put on a new cover. It was the same old mat with a new cover. I complained about this but nothing happened.
18. When they did that, added a new cover, it only made a bigger nest. Because of the heat, it grew faster. Everyone time you laid down on it with a new cover, the air would come out with the mites all over.
19. There was a nest of mites in my room from the mattress, but when I complained they said there were no bugs. When they did send someone to spray my room for bugs, it just made them all run out all over the room. One of the nurse practitioners gave me a bottle for cleaning and disinfecting because of it. They claimed it cleaned everything, but it can't clean the insects and the virus in the room. Hours after they sprayed, I told the officer and they saw the bugs too. I asked them to write it down in the books. They have a book on the desk and when something happens, they have to write down what happened but they didn't.
20. I came out of detention itching all over from bites. I saved one of the mites on a little piece of tape so I could identify what it was later. I haven't found anyone who can tell me yet. My daughter has it now.

On Solitary Confinement:

21. I was put in segregation at one point and called abusive names by one female guard. She called me a "jerk," and I asked her why she would be disrespectful to me when I had not been disrespectful to her. She just said, "because you are a jerk." She did it several times. I didn't like when she was insulted me.
22. When they put me in solitary confinement, they put me in a room with leaking water, and that's when I fell down and hurt my back. Even with the knowledge of the officers, nothing happened. They were supposed to move me into another room, but they didn't.

On Verbal Abuse, and Mistreatment by Guards; Malfeasance by Guards:

23. I told the judge the last time, before I was released, that I was being released with serious medical issues that CCA would not treat. The judge just said I had to ask my lawyer for help with that so I could sue. But the lawyer never helped me with that.
24. Some of the officers call you names and insult you. They call you an "F*****" Mexican. And if you tell them you are from Guatemala or El Salvador, they say "it's the same "s***" because you all speak Spanish." They insult people about their language with a very inappropriate vocabulary.
25. A few times I saw a guard touching a woman's boobs, it was very inappropriate. We are in detention and they make you feel you very unsafe. Sometimes they close the door with a lady officer inside for a long time.
26. I've seen officers in the control asleep. They used to have a mattress under the desk so one officer works in the control and the other is sleeping under the desk. I saw them do this all the time. They also go to the kitchen area and they sleep there too, I've seen a few sleeping there.
27. Our families used to be able to send cash in an envelope and the officers were stealing people's money. My family would send me 50, 80 a 100 and I opened it and it was missing and they tell you it's not there. They are suppose to put money on your books so you can get commissary, so to the commissary you cannot get anything, you know you saw the money in the envelope and it was there. They did an investigation and they fired 3 officers when they found who was stealing the money. I know one of them is still working there. After that they did not accept cash anymore, they do it with western union.
28. Another thing they do, when people are coming, they bring a lot of people to the medical room that way the people can see that a lot of people are in the medical room. when you go see the doctor, they say no you don't have an appointment today. But they put a lot of people there to say, see , we give medical attention to all these people. They do it just to fill up the room.
29. When I was released, they kept my social security card, my driver's license and the memory chip from my cell phone.
30. They ruined my life, because those are seven years I will never get back.
31. I know all of this because I saw it with my own eyes and saw others detained for a long time for no good reason.

PERMISSION TO SHARE

I, **Cristina Parker**, certify that I received verbal consent from **Anonymous** on **October 4, 2016** for Grassroots Leadership to share this with the Department of Homeland Security Advisory Council in their review of the agency's use of private prison contractors only.

	8/4/16
SIGNATURE	DATE

NAME:	Helen Arriola*
AGE AT TIME OF DETENTION:	40
COUNTRY OF ORIGIN:	El Salvador
GENDER IDENTITY:	Female
NAME OF FACILITY:	McAllen Border Patrol Station, Laredo Processing Center, T. Don Hutto Residential Center
DATES INDIVIDUAL WAS DETAINED AT FACILITY:	McAllen - 4/28 5pm to 4/29 12pm, Laredo 4/29 - 5/8 , Hutto 5/8 - 6/29
TOPICS COVERED IN COMPLAINT (MEDICAL, DUE PROCESS, SAFETY, ETC.):	Medical neglect, due process, verbal abuse, food safety, facility safety, retaliation, mental health, physical health, trauma

*Name changed to protect identitiy

I swear under penalty of perjury that the following statements are true and accurate to the best of my knowledge.

[body of declaration with numbered paragraphs]

1. I left El Salvador because it has such a high crime rate and we had no other choice. I came with my Aunt. We have always been working women, we had businesses. The Mara 18 gangs asked us for money for many years, and they threatened to kill us if we didn't pay. Finally we said we didn't want to give them any more money, so they tried to kill us. They tried to kill my aunt and they raped her. They threatened to kill our whole family.
2. I was not treated badly in the prisons, well a little bit in Laredo. My aunt was the one who had problems.
3. I was released from Taylor [T. Don Hutto]. My aunt remained in Taylor and while waiting for court was sent back to Laredo, where we both were before Taylor.
4. The judge had already given her asylum, but told her to come back with more evidence before she was released.
5. She was waiting to go back to court when she was taken to Laredo in the middle of the night, at midnight. She was not given a warning or an explanation. She was taken to Laredo along with 40 other women.
6. The guards in Laredo told her and keep telling them they have no rights, that they will get deported. They tell them they are not worth anything. They tell them they are there as punishment for coming to the United States illegally.
7. My aunt is not doing well. She doesn't eat, she's lost 35-40 pounds.
8. The room where she sleeps is flooded with greywater and all of the women have fungus on their feet. They have not given her medicine for it. Even if I send medicine, they will not let her use it.
9. They have to take the greywater out themselves. The smell is horrible. They have headaches all the time.
10. The women there also have fevers because of the greywater. They do not give them medicine.

11. They keep the A/C so cold there that she has had a bloody nose for 2-3 months.
12. They give them torn uniforms. Sometimes they don't give them clean uniforms for a whole week.
13. They disconnect the phones in Laredo so that it says it is out of service. They do not let them call.
14. My aunt is verbally abused in Laredo. But she has done nothing wrong.
15. September 22 was her last court date. We presented more evidence, newspaper clippings, threat notes, etc. They said it wasn't enough evidence.
16. They moved the next court date to December 15th. Living like that, she could come out dead.
17. We have a broken family. Our family is destroyed. It's a disaster.

CERTIFICATION OF TRANSLATION

I, **[name of translator]**, certify that I am proficient in the English and Spanish languages and that the foregoing was read to **[declarant]** in Spanish.

	October 5, 2016
SIGNATURE OF TRANSLATOR	DATE

PERMISSION TO SHARE

I, **[name of person taking declaration]**, certify that I received verbal consent from **[declarant]** on **[date]** for Grassroots Leadership to share this with the Department of Homeland Security Advisory Council in their review of the agency's use of private prison contractors only.

	October 5, 2016
SIGNATURE	DATE

I, **[name of person taking declaration]**, certify that I received verbal consent from **[declarant]** on **[date]** for Grassroots Leadership to share this declaration publicly in advocacy, campaigns, media and outreach intended to end private prisons contracts in immigrant detention or to expose the reality of immigrant detention.

	October 5, 2016
SIGNATURE	DATE

NAME: Hilda Ramirez

AGE AT TIME OF DETENTION: 27 years old

COUNTRY OF ORIGIN: San Marcos, Guatemala, Indigenous. I speak Mam.

GENDER IDENTITY: Female

NAME OF FACILITY: Karnes County Residential Center

DATES DETAINED AT FACILITY: August 1, 2014 to July 2015.

TOPICS COVERED IN COMPLAINT: Malnutrition, inadequate medical care,
maltreatment, verbal abuse

1. I was in the icebox with my son for three days without eating. It was cold, and I didn't have anything to cover myself with. There was no sunlight. I couldn't see the sunrise or the sunset. I didn't know what time it was. There was no clock so I didn't know what time of day it was.
2. I had no idea why they took me there. They just told me they were going to take me to my family, but I did not expect to go to a place like that. I didn't even realize there was a place like that. I didn't know there was a judge, or that I could have a lawyer, or that someone could help me. I speak Mam, and I wasn't told that there could be someone available to translate my language.
3. When we pulled up, I just saw a bus parked. I saw a big house. I thought it was a bus station where they would tell me how to get to my family; since they told me I was able to go with my family. I never imagined they would take me to a place like this.
4. They got us out of the bus and I went in. They made us get in a line and I saw a lot of immigration officials. I saw other officials, "GEO guards," there and then they registered us and checked to see what we had even though they had already checked us. Afterwards, they made us shower.
5. They gave us two changes of clothes.
6. I was shocked. I tried to ask why I was there and nobody would give me any information.
7. I tried to stay positive and thought they were helping me by giving me clothes and a shower. I thought maybe we would be waiting a while at the bus station and that's why they were being nice and doing this. I did not expect this.
8. I never let my son go. I was always holding his hand and I did not let them separate him from me.
9. I was terrified. I tried to be positive, but at the same time I thought I was being kidnaped. I thought, "Maybe this isn't immigration." But I had no idea what was going on. I tried to be positive, but I was also very afraid.
10. I couldn't see outside, the cars, all I could see were the walls and wires, and a lot of cameras all over.
11. They gave us our room number and guided us to the room. When I entered the room is when I began to feel very scared. This time, I really thought I was being kidnaped.
12. They put us in a room and told us where our bed was. There were eight beds in one room. We had other companions. We asked each other what was going on and many cried out of fear. Some tried to console us.
13. They didn't know what was going on either. Some started to cry because they didn't know where we were. We were panicking. We were the first group to get there the first ones on the bus.

14. Nobody explained what was going on. There were several guards watching us and I asked the guards why we were there and all they said was to ask immigration. They said they were just doing their job.
15. The guards were very tough on us. They never gave us explanations. At night, they knocked loudly and opened the doors very rough during the headcount at nights. They just banged on the doors and yelled at us to get up for check up.
16. The guards gave us a sheet of the rules but didn't explain what they were. They didn't let us know if we were getting out.
17. It was very sad.
18. There was a schedule. They woke us up at 7am to eat. They gave us something that looked like a burger and milk. And that's all we ate in the morning. At midday we got beans. But the beans were not always good. Sometimes they were very disgusting. They tasted rotten. The food was horrible, honestly. Sometimes there were worms in the beans and rice. But they never believed us. They said we were making things up. But we always respected food. We would never do such a thing. The food was horrible. We also had rice. Sometimes they made pizza. But the pizza was mainly bread and didn't have a lot of cheese.
19. A week passed and I thought I was kidnapped. They never gave us information. They never told us anything. We only ate and we followed the rules.
20. When a week passed I asked an official and he told me that I was getting out soon, not to worry. Another official asked me what was I doing here? He said, "Why don't you go back to your country. You're never getting out of here." He would confuse us all the time. In the end we never knew what was going on.
21. 15 days passed, a month, people were getting sick, they weren't eating. The kids were fainting. Many kids were fainting. Even the mothers were fainting. There was no medical attention. There was a medic, but when you went to see him and told him what was wrong all he said was to drink water and it would go away.
22. The water was Clorox. That's what it tasted and looked like.
23. Many children and adults had stomachaches. They had fevers. So many things happened.
24. When we complained at the medic he made us deal with the pain and never helped us. When he would check us he told us to drink water.
25. There were so many things that happened in detention.
26. We were like about a month or so locked inside. I don't know exactly how long it was because I couldn't tell time. But it seemed like forever that we couldn't go outside. We just went to get checked at 7am, again 4pm, at 8pm, and at 1am. They would check us at night as well. Everyone was locked in his or her rooms. We weren't allowed to go outside to enjoy the sun or go to the park, and we didn't know why we weren't allowed, they just didn't let us.
27. The nights were very sad. The cover was very thin. Just two thin covers for my son and me. And it was extremely cold.
28. We had a bunk bed but since they were so small so I was afraid my son would fall from the top because it had no protector. Even adults fell. Many children and mothers fell and fractured themselves. Even if you turned you could fall off. The beds were so small.
29. We slept together I slept on the edge and I rested on the ladder so I wouldn't fall off. It was very tight and we used both blankets so we could warm up because it was too cold.

30. As the months went by I was very sad and we didn't want to be there anymore. Until one day the official came and told me I had to do the interview.
31. Like I said I knew what an interview was, but they never explained that I could have a lawyer. If they would've told me I could have searched for a lawyer to help me in the interview.
32. They didn't speak my language and I spoke Mam more than Spanish. There were many words that they told me that I did not understand. The man spoke English and he would talk to the phone and the phone would talk to me in Spanish.
33. My claim was denied. They never told me why. They just gave me a sheet and a friend helped me. She knew Spanish and she told me my case was negative. The paper they gave me was in English. My friend put it together and it said it was negative.
34. I got very sad. If my case was negative, then what was going to happen to me? I was very afraid of going back to my country. I didn't want to go back. Which is why I keep fighting.
35. Four months passed, and I needed to go see the judge to tell me if I would be deported. By then I knew I could get a lawyer and the lawyer helped me.
36. The judge gave me a bond for ten thousand dollars. But I didn't have any money to pay it.
37. I appealed the case but it was negative again.
38. It was very sad. Very sad. But I told immigration that I didn't want to be deported. I preferred being there than to go back out of fear that something would happen to my son. It's one thing for something to happen to me, but my son is my only family and he's what keeps me going, I want to keep him safe. I would have rather lived in those conditions than to be deported.
39. Immigration would make me feel bad. They laughed at me and told me I didn't have anything to do here in the U.S. they told me to leave. Many times they made fun of me.
40. The food never changed.
41. I participated in the hunger strike to change the nutrition and to be heard, because it had already been a long time without medial attention or good food, children were getting sick, we had been there a long time, and bonds were way too high for us. So I participated in the strike so that our voices would be heard.
42. When they found out, the newspapers, in Washington, an official in uniform came to investigate. They knew what day the officials from Washington were coming to investigate so the guards gave us stuffed animals, they cooked, they made more coffee, they put table covers on the tables, they gave us more food. Normally, they only gave us two tacos, but when the investigators were there they asked us if we wanted more. But once the investigators left and we would ask for more, they would tell us we couldn't have any more food. So we stayed hungry. They even had games at the park. It was incredible.
43. When the investigators left the GEO guards went around with a bag to pick up all the stuffed animals they had given the kids. We didn't keep anything. It was not only that day. Every time the investigators came they put out all the things they did before, but would always take it away again.
44. The kitchen was full of flies and there was no disinfectant to clean. There were swarms of flies. You had to keep swapping them away from your food when you tried to eat. It was

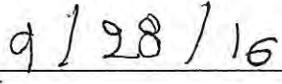
disgusting. They cleaned the tables with dirty water. They didn't even try to disinfect the tables.

45. There was a store to buy chips or sodas that we could buy; they told us we could buy food at the little store. They told us we could work so we could buy food. I worked three hours. They gave me three dollars for three hours. The worked was hard. I had to scrub the floor with my hand. I didn't have an object to clean the floor. The manager made us scrub with our hands. Block by block. That's how we worked to get money so our children could eat.
46. My son bled many times from his nose and he would vomit. Every time he went to the kitchen he returned with diarrhea and vomit. He always had stomach pain.
47. I tell my friends that I still communicate with, that I wish someone should sneak in a cell phone and record everything that happens to show the judge and they could believe us. Nobody believes us when we say what happens.
48. There was a woman who was held in a room for a month. They called her crazy and didn't let her leave. There was only one window and that's how we could try to talk to her; through the glass. They just gave her food but never let her leave.
49. They locked the people in the medical room.
50. During the strike they punished us. Immigration officials took away our jobs and we didn't get three dollars anymore. They threatened us and put us inside and asked us why we were on strike and said we didn't have the right to do it and we didn't have rights for anything. They said that we should go back to our country. That they were going to take away our children and they were going to put us in jail.
51. I would tremble and I would hide behind my friend because I was so afraid. Immigration was so mad at us for participating in the strike. They punished us by locking us up in the medical room.
52. There were so many things that happened in detention. The guards would yell at us, and curse at us.
53. It was horrible. They make you feel worthless. Dogs are treated better. My son would tell me that if we were dogs we could be treated better than we were.
54. It was very sad.
55. They gave me three reports because I broke the rules. I was consoling a friend because she was going to be deported. She was going to leave in the middle of the night. She was very sad and didn't want to be deported. She asked if her daughter could stay because she didn't want anything to happen to her. Officials found me consoling her and they got mad. They told us we shouldn't be with her, we should be in our rooms, they yelled at me. They were very rude.
56. They lied to us all the time. They would tell some people to go to medical to get treatment but they would never come back. They tricked them and they would be deported instead of going to see the medic.
57. I was scared of going to medical. I would suffer and deal with the pain. They never even helped. Even when my son would get fever, or stomachaches, I would try to put cold rags on him instead.
58. I was afraid to see immigration because I thought they would deport me just like that.
59. Due to lack of medical attention a female had a miscarriage. We saw when she started bleeding. They put her in medical. My friend who was cleaning the room said she miscarried the baby. She was afraid of telling anyone for fear of being deported. She had

complained of stomach pain for three days and when she went to medical they never did anything to help her. When we saw the blood we called the guards and they took her. She miscarried because she didn't get the attention she needed.

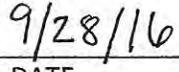
60. We lived in fear. There were so many things that happened and I didn't speak up out of fear that I would be deported or locked in the medical room
61. I was very afraid. I always felt like I was kidnaped.
62. All this time I wish I had sneaked in a cell phone to record everything that happened. Nobody knows what goes on, and nobody hears us and nobody believes us.
63. Why is it so hard to believe us? Why are these places still open?
64. It's so sad to see the people crying, locked up all the time.
65. Children would cry all the time.
66. There was a guard that was very mean. She was mean on purpose. She would bring food, and open snacks and juice in front of us just to rub it in our faces. The children would want some of what she had and she would get mad at the kids and be mean to them. She yelled at the kids and would tell them to go back to their country. She asked what they were doing here. She was always saying mean something to someone.
67. There were so many mean guards.
68. Karnes is the worst detention. So many rules from immigration and GEO. The malnutrition. It was too much for us.
69. We checked our boxes every week and they would check what we had. Some people that were deported or left would give us some of their things, and the guards would take it away from us. They didn't let us have anything. They would count all the clothes we had and not allow us to keep anything else.
70. What I want to add is that I hope the president or the judge allows someone to go in with a camera to record what happens. To have evidence. But it needs to be hidden cameras so that no one knows so they can see that what happens is real. If they know, they will make themselves look good like before.
71. It's not fair that these types of jails exist. We are not criminals to be jailed in this manner. We don't deserve to suffer this way. Especially the children.

I swear under penalty of perjury that the following statements are true and accurate to the best of my knowledge.

	
SIGNATURE	DATE

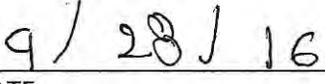
CERTIFICATION OF TRANSLATION

I, **Ruby Sanchez**, certify that I am proficient in the English and Spanish languages and that the foregoing was read to **Hilda Ramirez** in Spanish.

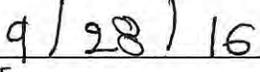
	
SIGNATURE OF TRANSLATOR	DATE

PERMISSION TO SHARE

I give Grassroots Leadership permission to share this with the Department of Homeland Security Advisory Council in their review of the agency's use of private prison contractors only.

	
SIGNATURE	DATE

I give Grassroots Leadership to share this declaration publicly in advocacy, campaigns, media and outreach intended to end private prisons contracts in immigrant detention or to expose the reality of immigrant detention.

	
SIGNATURE	DATE

Declaration of [REDACTED] A [REDACTED]

1. I am a homemaker from El Salvador. I am detained in Dilley, Texas by Homeland Security.
2. I went to see the doctor with my six year old daughter on 9/20/2015 at 6 p.m.
3. They asked if it was me or my daughter that sought medical attention. I informed that I was sick and had a terrible migraine.
4. They took my identification and asked me to wait in the reception. There were many children waiting.
5. After two hours, I asked them if they were going to assist me. They told me to wait more. I told them I could no longer wait because the pain was too severe. I asked if they would only give me a headache pill, please. If I could just get a simple pill, I could leave. They said no because the doctor had to see me and it had to be a prescription.
6. Another hour passed, when it was almost 10 p.m. at night and my daughter was asleep and very cold because she was suffering from waiting and tired, we simply left.
7. They told me if I was going to leave, I needed to sign a document. Finally, they said you are next, and I was not next-they only wanted me to sign a release.
8. While I waited, I witnessed a child that was almost convulsing with a fever. The women waiting were worried because his mother told me that his fever was over 100 degrees. She had already taken the child twice, and only a headache pill was administered.
9. His mother was crying and afraid her child would die because he wasn't getting medical attention. She was afraid.

I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge and recollection:

[REDACTED]

09/21/15
Date

I certify that I am proficient in the English and Spanish languages and that the foregoing was read to [REDACTED] in Spanish.



Jenny Doyle

09/21/2015
Date

AFFIDAVIT OF [REDACTED]

My name is [REDACTED] I was born on [REDACTED] in San Francisco, El Salvador. I have two children, a 13 year old daughter named [REDACTED] and a 6 year old son named [REDACTED]

[REDACTED] We were detained August 22, 2015 in Brownsville, Texas.

After several weeks of being detained in Dilley, my son became ill. He complained of nausea, sore throat, and fever. He vomited several times. I immediately took him to the clinic to receive care. My son was briefly examined and found to have a fever of 103. We were given Tylenol and told to take it for three days. I do not know if the person that saw us was a pediatrician. We arrived at 12pm, and did not leave until shortly after 5pm.

I was worried about my son, and gave him the recommended medication and doses as we were told. After three days, I saw that my son's condition had not improved. I took him back to the clinic, but since there is no doctor present at night we were not able to have an exam. The nurses on duty gave us a few more Tylenol, and told us to come back during the day for an exam. This time we arrived at 10pm, and left at 1am. We were given an appointment for 1pm for the next day.

When we returned to the dormitory, my son was inconsolable. He had been crying almost constantly since he became sick, but this night he was especially upset and screaming. It was obvious that he was still very ill, and that the Tylenol was not giving him any relief. We did not sleep at all that night.

The day of the appointment, I knew we could not wait until 1pm for our appointment, so we arrived early at 12pm. I explained to the receptionist that my son had been ill for several days and up all night, and asked if we could see the doctor earlier. I was told that there were many children in line and that we would have to wait. We did not see the doctor until 4pm.

When we were finally able to see the doctor, she examined my son and quickly decided that he needed medical attention in a hospital. She prepared the forms for us to leave, and we prepared to leave for the hospital.

My daughter was waiting for us in the dormitory. I wanted to let her know that we were going to the hospital, and not to worry. I wanted to let her know that everything would be ok and that we would be back soon. I was not allowed to speak with my daughter

before going the hospital, and the guards told me that they would speak with her. I asked that they please allow me to speak to my daughter before leaving, but they would not let me. I knew that my son needed to be taken to the hospital and did not want to miss our chance, so I left for the hospital without speaking to my daughter [REDACTED]

My daughter became worried because we had not returned and no one had told her anything. She came to the clinic to look for us, and was told by another woman in our dormitory that we had been taken to the hospital. She became extremely upset that she was alone, and because she did not know the condition of her brother.

[REDACTED] began to cry, and called her cousin [REDACTED] that lives in Houston. She explained to her cousin that she had been left alone, that we had been taken to the hospital, and that she did not know what was going on. [REDACTED] contacted the attorneys working with us, who were able to meet with my daughter and contact me in the hospital on Friday. She was immediately relieved to hear my voice, and to know that we would be back.

I stayed in the hospital with [REDACTED] until Saturday afternoon. He was given fluids, and had tests done on his stomach. They believe that a virus caused his symptoms. When we were released, it was clear that he was in a much better condition. I thank God that we were able to receive treatment in the hospital, and that he has not had any relapse.

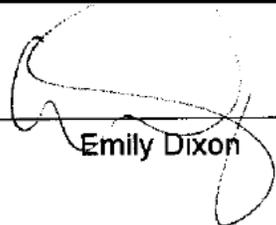
I declare under penalty of perjury under the laws of the United States that the above statements are true and correct to the best of my knowledge and recollection, followed by the date and signature.

[REDACTED]

9-30-15
Date

I certify that I am proficient in the English and Spanish languages and that the foregoing is a written transcription of the verbal declaration made to me in Spanish by [REDACTED]

[REDACTED]



Emily Dixon

9/30/15
Date

My name is [REDACTED] A# [REDACTED] currently detained at the South Texas Family Residential Center with my daughter, [REDACTED] since September 21, 2015.

On September 21, 2015, I was called via telephone by individual who identified himself as an immigration official. He spoke to me in Spanish and inquired whether I suffered from medical ailments, underwent surgeries, and was under medication.

I advised the officer that the "mareros" shot me two times in the stomach and back area and left for dead. I underwent surgery in El Salvador. Because of that assault and the continuous threats, I fled El Salvador to seek asylum from the United States of America.

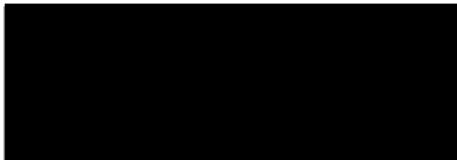
I specifically told that Officer that I received some medication for the pain at the holding facility before I arrived at here at the Residential Center but that I ran out of the medication. I told him I was experience intense pain.

Yesterday, September 27, 2015, I finally saw the doctor, and I explained that I was shot. I told him that my intestines were ruined and were sewn up and that the bullets destroyed part of my ribs. I explained that I experienced constant discomfort and at times the pain was so intense that I try to alleviate it by standing or laying down, but t won't go away.

The doctor did not give me any medication to alleviate the pain or advise me as to how to manage the pain when it became unbearable.

When my stomach injuries flare up and the pain is intense, I am not able to take care of my daughter. I suffer not only because of the pain, but because my daughter gets nervous seeing me in pain.

I declare under penalty of perjury under the laws of the United States that the above statements are true and correct to the best of my knowledge and recollection.



28 09 2015
Date

I certify that I am proficient in the English and Spanish languages and that the foregoing was read to me in Spanish.

CARA Volunteer Crucita Flecha

9/28/2015
Date

A [REDACTED]

AFFIDAVIT ABOUT MY DAUGHTER'S ILLNESS AT THE DILLEY DETENTION CENTER

1. My name is [REDACTED]
2. I have been detained at the Dilley family detention center for several weeks with my three-year old daughter [REDACTED]
3. We were first detained after we crossed the U.S. border on August 21, 2015.
4. My daughter has been very sick since the second week of our time in detention.
5. My daughter has had a fever and diarrhea, and she has been vomiting and coughing. Her ear started to hurt so much that she was constantly clutching it.
6. I tried to get her medical treatment. When I went to the medical unit, we had to wait five or six hours before my daughter could be seen. When I finally saw a nurse, I told him about all of her symptoms. The nurse took her blood pressure and examined her mouth and ear. He said it looked like she was dehydrated and her eardrum had exploded, so he took her to see a doctor. The doctor examined her mouth and ear, and told me that it was a virus or infection, and that we shouldn't worry about it. They did not give me any medication for my daughter, except for some Vick's VapoRub. The doctor just said that I had to wait two to three weeks for my daughter to get better.
7. [REDACTED] was perfectly healthy before she was detained. Now she is suffering. She has lost weight because she is not eating properly. She has become very thin.
8. The milk here seems to make her sick. Every time she drinks milk, she vomits and has diarrhea. I have stopped giving her milk, but she gets very hungry and begs to drink it.

9. Even though my daughter is still sick, I have not returned to see the doctor again because they did not do anything to help her when I went before.
10. I have gone to the commissary to look for something to give her, to help her regain her health, but they didn't have anything for her.
11. I am very worried about my daughter here.

Signature 

Date 9/14/15

Place Dilley, Texas

Declaration of [REDACTED] A# [REDACTED]

1. When I was 21-years-old, I had an abortion and immediately after I had the abortion, I was diagnosed with high blood pressure. I also had problems with being overweight, and I suffered symptoms such as fatigue and headaches regularly. I went to the doctor, and I was diagnosed with high blood pressure.
2. Since this time, I have been required to go to the doctor every three months for follow up on my medical condition. I have also been taking a medication to control my high blood pressure since that time. The medication is called Enalapril (50 mg), and I have to take it daily.
3. I was detained in Dilley, TX on Saturday, September 19, 2015. The first opportunity I had to see a doctor in the detention facility was on Friday, September 25, 2015. It was very hard to get a consultation appointment with a doctor prior to this time.
4. At my initial medical appointment, I informed the doctor of my medical condition. The doctor told me to tell her about any severe conditions affecting my health. I informed the doctor that I have high blood pressure and have to take Enalapril daily. The doctor told me she would try to find out if they have this medication available. Until today, October 2, 2015, no doctor from the clinic has followed up with me to inform me if the clinic has the medication I need.
5. The doctor also told me on September 25, 2015 that a nurse will check my blood pressure every day for one week to monitor its level. No nurse came to check my blood pressure that week or anytime after. Until today, October 2, 2015, no one has come to check my blood pressure.
6. I had brought some of the medication with me when I came to the United States, but I ran out of it about one and a half weeks before being detained. Now, it has been almost three weeks since I last took my medication.
7. On September 30, 2015, I spoke to the volunteers at CARA, and they took the information about my medical condition. They recommended I go to follow up at the clinic. I tried to go to the clinic that afternoon. At the entrance of the clinic, there was an officer who refused to let me in. The officer told me that I had to have an appointment to see the doctor.
8. I explained to him my situation and that the doctor told me almost two weeks ago that she would try to find out if they had the medication that I had to take daily. He still refused to let me in, and he did not tell me anything about how I can make an appointment. I asked if we have to wait to get scheduled and called in to the doctor. He told me yes. I left because it was my understanding that I could not request an appointment. I thought I had to wait for the doctor to call me in for an appointment.
9. Because I have not been taking my medication, I have been experiencing a number of adverse symptoms on my health. I have consistent headaches. I am also very fatigued all the time. I do not have the energy to do anything, and I just want to rest. My vision is also sometimes blurry.
10. Yesterday night, on October 1, 2015, I felt very bad. I was desperate because I could not breathe well for about thirty minutes. I also started feeling palpitations in my chest, and I could not sleep. I left the dorm and tried to get fresh air to calm my breathing down. This was the first time I felt this bad since coming to the detention center. Also, my headache has been constant since yesterday. I would rate the level of pain as 7 out of 10, with 10 the worst pain in

my life. I did not even have pain medication to take for the headaches as all the medications we get must be from the clinic.

11. I have done my best to make sure my symptoms do not impact my ability to care for my 4-year-old daughter, [REDACTED]. However, it has taken much effort from me to continue taking care of my daughter. It is much more difficult without my medication.
12. My symptoms are getting worse every day. I should not be without my medication for this long, and I am afraid for my health. I feel that my health has been neglected by the doctors who are supposed to respond to my health concerns.

I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge and recollection:

[REDACTED]

Oct. 2/2015

Date

I certify that I am proficient in the English and Spanish languages and that foregoing was read to [REDACTED] in Spanish.

Emma Esperanza Puentes
Emma Esperanza Puentes

Oct. 2/2015

Date

DECLARATION OF [REDACTED]

1. My name is [REDACTED]
2. I have been detained in the South Texas Family Residential Center since August 15, 2015 together with my three children.
3. My children were all perfectly healthy before arriving in the United States, but now two of my children are sick.
4. I crossed the border with my family and we were kept in the hielera for a day and a half. That's when my daughter [REDACTED] first got sick. She had a cough and was very cold, but no one would give me even a sheet to cover her as she slept on the floor. None of the officers offered my daughter medicine or showed any concern about her cough.
5. When we got to the detention center, the cough continued. I gave her honey and lemon. No one told me there was a place here where I could get medicine for her. I did not ask any officers about where to get medicine because I did not think the officers wanted to help me.
6. During my first week here, I asked an officer how to use the washing machine, and he just told me that he did not speak Spanish. He did nothing to help me. After that, I stopped asking officers questions because I was afraid that they would not help me and that I might get in trouble.
7. On Saturday, September 5, she became congested. On Monday, September 7, she also had a very bad fever. I tried to take care of her. By then someone had told me about the infirmary, so I brought her there. I had to wait five hours to see them. When we finally saw a doctor, she said that my daughter had a fever of 104 degrees. All they gave her was ibuprofen.
8. We came back every day for the next three days. Each time I had to wait about five hours. Each time all they gave her was some ibuprofen. Every day after leaving, the symptoms came back. She would get chills at night and couldn't sleep.
9. After the third time, I decided I wouldn't go back to the doctor. It wasn't worth waiting five or six hours in line to just get some ibuprofen. Instead I tried to put wet towels on my daughter's forehead and body to make her feel better.
10. The morning of Friday, September 11, one of the guards observed what a bad state my daughter was in and knew that she needed help. The guard contacted an ICE officer, who came to my room to look at my daughter. A doctor then came to my room. The doctor told me to take my daughter to the infirmary. I went to the infirmary and still had to wait five and a half hours to see a doctor. The doctor said she was sorry, but she had no medicine for my daughter. All she could give her was more ibuprofen.

11. Later that day, the guard saw me again. When she found out that I hadn't gotten any medicine for my daughter, she helped me fill out a report describing how sick my daughter was. Later, she told me to go to the infirmary again, and because it was an emergency, I only had to wait one hour. When I saw the doctor, she said that my daughter had a problem with her sinuses. The doctor gave her Vick's VapoRub and throat medicine that helped her feel better.
12. Every day since then, I have to go back to the pharmacy to get the throat medicine. They will not let me pick it up more than one dose at a time. I have to wait in line for an hour every single day to pick up the medicine. Although the Vick's was helping my daughter feel better, the people at the pharmacy will not let me have more unless I have another appointment with the doctor. I have not had one because I will have to wait five to six hours.
13. Now she is not congested, her throat feels better, and the fever has stopped. However, she has lost her appetite. When she first got here, she did not like the food, but she was willing to eat it. Now she barely eats anything at all. Every time I take her to the cafeteria, she just falls asleep. She has lost so much weight. Last Thursday when we went to the infirmary, they told me that she had lost four and a half pounds, but she has lost even more weight since then. Her ribs are visible, and the pants that fit her when she arrived here are so loose that they fall down.
14. She has very little energy. She missed a week of school because she was sick. But her teacher told me that even though she was sick, I had to make her go to school or else that would hurt my case.
15. My son [REDACTED] is also sick. The teacher sent him home from school because his eye was red. She thinks that he has conjunctivitis. I don't think I can get him treatment because we would just have to wait five hours to be seen, and it took me six trips to the doctor to get real medicine for my daughter. I think if I brought my son there now, they would just have me sit there.
16. In addition, for days my son has had no appetite. Yesterday he didn't eat anything. He told me that he doesn't want to eat. All he wants is to leave here.

Signature

9/16/15

Date

DECLARATION OF [REDACTED]

My name is [REDACTED] I am currently detained with my two sons, [REDACTED] and [REDACTED] in the South Texas Residential Center in Dilley, Texas. My children and I have been in immigration custody since August 26, 2015. My son, [REDACTED] is very ill. He is 4 years old. His illness has been ignored by the medical staff at the STRC and I am very concerned about the serious consequences to his health, both short term and permanent long term damage.

My son, [REDACTED] is anemic. His anemia was diagnosed when he was an infant. He requires regular medication to supplement his iron. The cause of the anemia is not yet known and therefore he requires regular medical intervention to monitor his health. Without this care, his health becomes very bad and he is very fragile. The medical staff at STRC have provided no interventions of any type regarding his anemia even though I made them plainly aware of his condition once we were transported to this detention center.

A short time after we were transported to STRC, [REDACTED] underwent a medical appointment. I explained at that time that he required intervention for his anemia or otherwise he will experience very bad symptoms. The STRC made no interventions and have provided no other supplementary treatment for him. I made an additional inquiry a few days ago and, again, no interventions were made and no treatment.

Presently [REDACTED]'s health worries me a great deal. He complains of pain in his head, his complexion is pale, his lips turn purple and he shakes from being cold even though the temperature is very hot outside. He is listless, does not engage in normal play activities with other children because he lacks the energy and is constantly fatigued. He vomits.

He requires immediate medical interventions to prevent hurting his health.

Signed this 20th day of September, 2015 in Dilley, Texas,

[REDACTED]

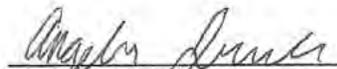
AFFIDAVIT OF

1. My name is [REDACTED] I am from El Salvador. I am currently detained in Dilley, Texas with my twelve year old daughter. We have been detained since August 12, 2015.
2. In our first week in Dilley, my daughter and I went to get vaccinated, and we had to wait a very long time. We went to the medical center at 10am and left at 6:15pm.
3. On August 15, 2015, I requested glasses for my daughter. We still have not received any glasses. I have gone to see the doctors for them three times and they keep doing eye exams. I asked them when they were going to give her glasses, but we are still waiting. Every time I go to the doctor it takes at least two hours to be seen.
4. In El Salvador, my daughter was treated by some doctors at a foundation and they found that she has a disease that makes it so that she can't see well both close and far away. I don't remember what the disease is called but I've told the doctors here. She had glasses in El Salvador but we couldn't bring them here when we fled because we didn't know what would happen on our trip.
5. She needs the glasses for school where she can't even see the computer screen. The school sent a letter saying that her eyes were tearing up and that she couldn't see the screen too.
6. It has been very hard to not have glasses for my daughter. She has constant headaches. I worry for her having to use a computer screen and it hurting her eyes more. I am scared that her vision is going to get worse and that she is going to have more problems.

I declare under penalty of perjury under the laws of the United States that the above statements are true and correct to the best of my knowledge and recollection:

[REDACTED]
9/17/2015

I certify that I am proficient in the English and Spanish languages and I read the foregoing in Spanish to [REDACTED] prior to her signing it:


Angelica Juarbe Santaliz

9/17/2015

Declaration of [REDACTED] A# [REDACTED]

1. My name is [REDACTED] and me and my son [REDACTED] are from Honduras and have been detained since August 29, 2015. We arrived in the detention facility on September 2, 2015.
2. My son [REDACTED] who is two years old, and I both became very ill three days after we arrived in the detention facility. We had a cough, a cold, and a fever.
3. I took [REDACTED] to the clinic at the detention facility that same day and we were seen by a nurse around 9pm. She gave us ibuprofen, and when I asked for antibiotics and she said they were not authorized to give prescriptions for antibiotics or medicine, and that doctors were not there at that hour.
4. We returned the next day at 7pm because our sickness was worse, and we were seen by a nurse. She checked us and gave us ibuprofen again.
5. We returned two days later because we were still sick and [REDACTED]'s sickness got bad after dinner. There was only a nurse on duty and she just gave him Vick's and honey.
6. The next day I took back to the clinic at 9am and we waited until 1pm to be seen, but the doctor was out to lunch. We left because we had come specifically to see the doctor to get medication.
7. The fifth time I was seen by a nurse at midnight because [REDACTED] still had a cough, cold, and fever, and he had been vomiting and wasn't eating for 6 days. He was full of phlegm and was only drinking water. The nurse made an appointment for [REDACTED] and I to meet with the doctor the next day at 10am.
8. We arrived at 10am and we were seen by a doctor at 11:30am. She gave us a prescription for ibuprofen and Vick's refills every 6 hours.
9. I was hoping they would give [REDACTED] antibiotics and/or medication for his infection in his throat and for the vomiting and pain in his stomach, but we just got the same ibuprofen and Vick's, and were told to drink more water.
10. The doctor and the nurses told me that his sickness was normal and just a virus that was going around, and that if he just drank more water he would be fine.
11. I was upset because they wouldn't actually do anything to help my son get better. It seems like they don't even have medicine to give anyone here. Either they don't have medicine or they just aren't giving it out.

I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge and recollection:

[REDACTED]

21/9/2015
Date

I certify that I am proficient in the English and Spanish languages and that the foregoing was read to [REDACTED] in Spanish.

[Signature]
Ian Philabaum

9/21/15
Date

A

**AFFIDAVIT REGARDING MY SON'S MEDICAL CONDITION AT DILLEY
DETENTION CENTER**

1. My name is [REDACTED]
2. I have been detained at the Dilley family detention center for over a week with my son [REDACTED] who was born on [REDACTED] (4 years old).
3. We were first detained after we crossed the U.S. border on September 6, 2015.
4. My son has had two medical conditions since about a year ago. The first problem is that [REDACTED] has been losing his hair. His hair loss has worsened significantly since he has been detained at the Dilley family detention center. The second problem is that [REDACTED]'s right eye is swollen, painful, and red. Tears continuously flow out of only this eye.
5. I tried to get [REDACTED] medical treatment on or about September 14, 2015. When I went to the medical unit, we saw a doctor and I explained [REDACTED]'s condition. The only thing that the doctor did was perform a vision test on [REDACTED]'s eye. [REDACTED]'s vision was normal and the doctor told me that the problem was just allergies.
6. The doctor told me that there was nothing that the medical unit could do about [REDACTED]'s hair loss because the problem requires a specialist that is not available at the Dilley detention center. Another doctor saw [REDACTED] and told me that the problem seemed urgent and that I should obtain a specialist as soon as I am released.
7. I believe that my son's hair loss condition has gotten worse since we have been detained and that he needs urgent care from a specialist. I also believe that [REDACTED]'s eye condition is not due to allergies and is more serious.

I declare under penalty of perjury under the laws of the United States that the above statements are true and correct to the best of my knowledge and recollection:

[REDACTED]
Date 9/17/2015

Statement of [REDACTED] A: [REDACTED]

1. My name is [REDACTED] I was born on September [REDACTED] in Marazan Yoro, Honduras.

2. I was detained by Custom and Border Protection on September 6, 2015 with my child, [REDACTED] (A: [REDACTED]).

3. Since September 6, my time in detention has been frustrating so far because the medical clinic refuses to tend to my daughter's medical needs.

4. On September 8, my daughter began complaining about a severe ear and headache and was experiencing knee pain. I, being very concerned for my daughter's well-being, took her to the clinic to get her the attention she needed. We didn't have to wait too long for her to be seen this first time. However, when she was finally seen, the medics told us that she was "going to be fine" and told her to drink water. This was frustrating for me because I believed she was suffering from an ear infection. Water does not fix this.

5. On September 16, my daughter came down with a fever and cough. This time, when I took her to the clinic, we experienced a wait time of about 6 hours. When they finally got to her, they told us that she had to be rescheduled for the next day. This is terrible because my daughter needed immediate attention, yet the clinic didn't prioritize her health.

6. The next day, when the clinic was finally ready to see us, we experienced a wait time of 4 hours. My daughter was very sick and she began getting fussy so we decided to just leave. We already knew that they would not actually do anything to help us. In order to leave, I was made sign a document that I was told said that I was waiving my right to get medical help for that day. The paper was in English and I'm not sure if what I signed actually said what I was told it said.

7. I feel very overwhelmed with this situation because, I feel like they will never tend to my daughters needs even if she were to get very ill. This could include very serious health problems. My daughter could be dying from a disease, and all they would do is give her water, or she would die waiting extended hours.

8. I have been waiting for more than two weeks with my very young child and it has been a very overwhelming situation. The quicker I can leave this place, the faster I can find my daughter the medical attention she needs and deserves.

Date: 9/24/15

Translation Certification

I declare under penalty of perjury that the above statement was read to the respondent in her native language of Spanish and that she understood the statement before she signed.

Cristal Ibarra
Cristal L. Ibarra

Date: 9/24/15

Declaration of

A#

1. The day before yesterday in the evening, I started feeling very sick. I had body aches, fever, my throat was hurting, my ears started hurting. I had to go take my daughter to the doctor, and while I was there they I got lucky and spoke to a nice woman, who was able to help me, and she gave me some Tylenol and told me to take it every four hours.
2. The next day, yesterday, I got worse. I had terrible bodyaches, my bones hurt, my ears heart, my sinuses hurt, I had a fever, my throat hurt, I had a headache, chills, and was dizzy. I do not usually get sick, but I was feeling so bad that I had to go to doctor. After dinner, after 7pm, I went to the doctor. They would not let me in with the stroller, even though my baby, who is 1.5 years old, was asleep in it. So even though I was very sick, I had to hold her in my arms while watching my other girl.
3. I waited about a half hour, feeling every minute worse. Finally, I decided that it would be better for me if I went back and lay down instead of continuing to wait. I told the guard that I was not going to wait anymore. He told me that if I left I had to sign a form saying that I didn't want to wait anymore, why, and told me that I could not return that night. I wrote down why I was not waiting anymore and signed. One nurse signed, and told me that the other nurse was also going to sign as a witness.
4. About one hour after returning to my room, the guard who was there saw me. I looked very bad, and I felt bad, with fever and chills and a headache and body aches. She asked me what was wrong, I told her what was going on, and she told me that I had to go back, I had to get medical care because I was not doing well. She told me that she would send me as "an emergency" and that then they had to help me. I asked her if it would be a problem that I had signed the paper, and she said that it would not, that they could not deny me medical attention. She told me that a guard was going to accompany me, and that he had to tell them that I needed to be seen as an emergency. That other guard walked me back to the medical trailer, but when we got there he did not say anything, he just took the stroller inside and then left.
5. When I got back, I told the guard, the same one who made me sign the paper before, that I had returned, that the other guard had sent me as "an emergency." He asked me, "again, now what are you doing here?" He laughed at me, saying "oh, an emergency," while laughing and shaking his head, and told me to go wait in the waiting room, then went to talk to the nurses. I did as he told me, and sat in the waiting room. I had my two girls with me, and I had to take care of them even though I was feeling terrible myself. I continued to feel worse and worse. I could see him sitting with one of the other guards, looking at me, and then talking to the guard and laughing.
6. After three hours I had still not been seen. Finally, the shift changed and new guards. I went to talk to the new guards asking them if I was going to be seen soon. When I got up there I saw that my ID was not in the spot where ID's are when you are waiting to be seen, and was just off to the side on the table. I asked the guard why my ID wasn't in the line, and she said it was fine, that she was going to go see my papers.

7. She then told me that the papers showed only that I had come in earlier, around 7, and then left less than an hour later. It did not show that I had returned. I could not believe that the guard had not put me on the list to be seen, especially as sick as I was. I became very upset and began crying, because I could not believe that he could be that terrible to me. I asked them if I had to sign a paper like the first time so I could leave, and they said I didn't because I had never been put on the list. I left without getting any medical attention.
8. Today, around 10am, I spoke to an ICE officer about what had happened yesterday. He showed me a paper, I think it was the one I signed the first time I left the clinic, telling me that it said that I had been seen. I told him that that is not what happened; that the paper I signed was saying that I had left without being seen. He told me that he was going to go see if I was lying to him, and that if I was he didn't want to hear from me again. He didn't tell me what he was going to do if I was not lying.

I declare under penalty of perjury that the above statements are true and accurate to the best of my knowledge and recollection.



9-20-15

Date

I certify that I am proficient in the English and Spanish languages and that the foregoing was read to 

A handwritten signature in blue ink, appearing to be 'Atenas Burrola', written over a horizontal line.

Atenas Burrola

9-20-15

Date

Declaration of

[Redacted]

A#

[Redacted]

1. At the beginning of last week, I went the vaccination appointment. I waited five hours and they finally called me in. When they saw me, they explained the vaccination process to me. The woman who attended my daughter and I asked me if I agreed with the vaccination process and I signed the document. My daughter then pooped. I asked the nurse if she had a diaper because my daughter had diarrhea. I changed my daughter's diaper.
2. The nurse told me they could not vaccinate my daughter because she had diarrhea. She told me they would wait two days until my daughter did not have diarrhea.
3. The nurse did not give me medicine for my daughter's diarrhea. Instead, she recommended I give a lot of water to my daughter. This angered me.
4. That same week, my daughter became sick with a cold. I took her to the clinic and I did not have to wait long to be seen. The nurse checked my daughter and told me there was nothing abnormally wrong with her. I asked for medicine and the nurse refused because only a doctor could prescribe medicine.

I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge and recollection:

[Redacted Signature]

09/17/2015
Date

I certify that I am proficient in the English and Spanish languages and that foregoing was read to [Redacted] in Spanish.

Aminta Menjivar
Aminta Menjivar

09/17/2015
Date

SWORN AFFIDAVIT OF [REDACTED]

I, [REDACTED] born on [REDACTED] in [REDACTED]

Guatemala, declare and state as follows.

I have personal knowledge of the facts set forth herein. If called upon to testify, I would testify truthfully and competently to the following.

1. My name is [REDACTED] I was born on [REDACTED] in the village of [REDACTED] Guatemala. I am [REDACTED] years old.
2. My 5 year old daughter, [REDACTED] (date of birth: [REDACTED]) and I have been detained at the South Texas Family Residential Center since September 3, 2015.

CONCERN OF CANCER AND LACK OF TREATMENT IN DETENTION

3. About a month and half ago, I experienced stomach pain, pain during urination and lot of vaginal discharge. At that time I was living in my village [REDACTED] in Guatemala. I went to see a doctor there but the doctor was unable to help me. So, I went to see another doctor in Guatemala City. The doctor in Guatemala City examined me for an hour.
4. She told me two things. One, I had urinary infection and gave me antibiotics for 7 days. Two, when she examined me she saw a hemorrhaging ulcer in my uterine neck. The doctor told me that this is the first symptom of cancer. I was planning to go back to the doctor to find out if it is cancer.
5. On September 3, 2015, I was detained in Texas with my daughter [REDACTED] and brought to the detention facility where [REDACTED] and I are presently living.

6. Last week on Wednesday, I met with a female doctor in detention. I told the doctor in detention about my previous diagnosis in Guatemala; that I had an infection and might have cancer. I also told her that I am still experiencing stomach pain.
7. The doctor told me that they could not treat me here. The doctor in detention did not perform any exam on me. I gave a urine test to the doctor. But I have not heard back on whether I still have an infection.
8. I don't know whether I have cancer.

LACK OF MEDICAL TREATMENT IN DETENTION FOR INJURIES TO MY 5 YEAR OLD CHILD

9. Last Monday, my 5 year old child [REDACTED] fell on her face and hurt herself. She began bleeding from her upper right lip and the bleeding would not stop. I immediately called for medical help. It was 7 PM when [REDACTED] fell and started bleeding. A doctor finally arrived at 12 midnight. [REDACTED] was crying a lot and after a few hours she had fallen asleep when the doctor came. The doctor told me to give [REDACTED] some ice. The doctor did not give [REDACTED] any pain reducing medicine or check for any infection.
10. Next morning when [REDACTED] woke up she had a big swelling on her upper right lip which lasted for few days. Now, she had a huge black mark next to her lip that is big in size and very visible.
11. The doctor did not call or follow up to see [REDACTED] again.

REQUEST TO BE RELEASED FROM DETENTION SO I CAN SEEK MEDICAL HELP FOR MYSELF AND MY DAUGHTER

12. My mother, [REDACTED] my step-father, [REDACTED], and my older brother [REDACTED] live in [REDACTED] New Jersey.

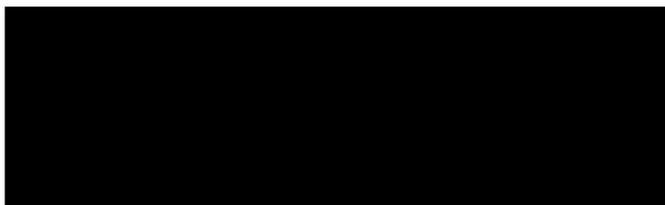
13. I do not have any criminal history or any arrests in the past.

14. I request that I be released from detention so I can seek medical help if I have cancer and to get treatment for urinary infection. I also want to seek medical help for [REDACTED] for her injuries and get treatment.

15. I request you to kindly release me for medical and humanitarian reasons. I will follow all the instructions and obey the laws of the United States of America.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 14th day of September 2015 at the South Texas Family Detention Center in Dilley, Texas.

I declare that the above was translated to me from English to Spanish by Mr. Stefan Babich.



Interpreter's Certification:

I certify that I am fluent in English and Spanish. I further certify that I translated this document in its entirety from English to Mam to [REDACTED]

 Stefan Babich

Name: Stefan Babich
Contact Number: (314) 853-1679


Signature

9-14-15
Date

MEDICAL AFFIDAVIT:

Client Name: [REDACTED]

County of Origin: El Salvador

Age of children detained with Client: 9-year-old girl [REDACTED] 7-year-old boy [REDACTED]

Date of Detention 09/22/2015

On September 28th, 2015, I went to my scheduled appointment and I had to wait four (4) hours to have a doctor see my daughter [REDACTED]. She was diagnosed with tachycardia, excessive fast heartbeat, when we lived in El Salvador. At the appointment the doctor said that everything was okay and no medication was given. The doctor informed me that she was going to refer my daughter to a cardiologist. I still have not seen the cardiologist. I don't think that this was adequate treatment because my daughter still keeps getting sick. She keeps getting chest pains and her heartbeat starts beating fast.

While at the doctor's, it was too air conditioned when I was waiting with both my children. While I was waiting, I saw the doctors go to lunch before they decided to attend us. I missed a legal appointment at 1:00PM because of the excessive wait time to see a doctor. My children were crying because they were hungry while we waited for the doctor. We asked a nurse if we could leave to go get lunch but he said no because the doctor were on their way. From the time that nurse told us that the doctors were on their way and the time we actually saw the doctor it was a two-hour wait time. I also spoke to the doctor about my son's two loose teeth and she informed that it would take one month to see a dentist.

In addition to the excessive wait time, I have not received adequate medical treatment for my urinary tract infection. When I was held at the border I obtained a urinary infection because I was not able to take a shower. They gave me medication to treat the urinary tract infection at the border. The medication was not making my urinary tract infection go away and I was feeling worse. I spoke with the doctor at Dilley on September 25th around 10 in the morning and she informed to just drink water and to take the medication that was not working for me. I told the doctor that the medication was not working and that it was making me feel worse.

I declare under penalty of perjury under the laws of the United States that the above statements are true and correct to the best of my knowledge and recollection, followed by the date and signature.

[REDACTED SIGNATURE]

10/2/15

Date

I certify that I am proficient in the English and Spanish languages and that the foregoing was read to [REDACTED] in Spanish.

[Handwritten Signature]

10/2/15

Jose A. Juarez, Jr.

Date



December 10, 2015

Megan Mack
Office of Civil Rights and Civil Liberties
Department of Homeland Security
Washington, DC 20528

John Roth
Office of Inspector General
Department of Homeland Security
Washington, DC 20528

Re: Family Detention – Challenges Faced by Indigenous Language Speakers

Dear Ms. Mack and Mr. Roth:

We write to share our collective concerns regarding the challenges that indigenous language-speaking mothers and children in family detention centers face in procuring access to justice. These challenges include: (1) inadequate screening at the border and within family detention centers; (2) a lack of interpreting assistance for other interactions with government officials, subcontractors (including medical staff) and service providers; and (3) a lack of translated written materials. Our concerns are broken down by interaction with each agency that these mothers and children encounter: U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), and U.S. Citizenship and Immigration Services (USCIS).

Since April 2015, the CARA Family Detention Pro Bono Project (“CARA Project” or “CARA”)¹ has provided legal counsel and representation to several hundred indigenous mothers and children detained at the South Texas Family Residential Center (STFRC) in Dilley, Texas and the Karnes County Residential Center in Karnes City, Texas. In preparing this complaint, the CARA Project identified over 250 indigenous families represented by the Project staff and volunteers in the Dilley and Karnes detention centers.

¹ The CARA Family Detention Pro Bono Project is a partnership of four organizations: Catholic Legal Immigration Network, Inc.(CLINIC), American Immigration Lawyers Association (AILA), Refugee and Immigrant Center for Education and Legal Services (RAICES), and the American Immigration Council (Council).

Background

A significant number of families seeking protection at the U.S. border with Mexico speak indigenous languages. The over 250 indigenous language speaking families represented by the CARA Project since April 2015, who are primarily from Guatemala, speak variations of Akateco, Kanjobal, Quiche, Kekchi, Mam, Maya, Popti, Achi, Garifuna, Kaqchikel, Chuj, Ixil, Lenca, and other Mayan languages.

Indigenous peoples are among Central America's most vulnerable, impoverished, and illiterate citizens.² Indigenous women, in particular, have less access to education and are less likely to work outside the home than their male counterparts; as a consequence, indigenous women are less likely than indigenous men to be proficient in Spanish.³

The U.S. government is obligated to ensure that indigenous language speakers have meaningful access to federal programs and activities.⁴ CBP, ICE, and USCIS, in coordination with CRCL, have each developed their own individual plans to accommodate limited English proficient (LEP) individuals.⁵ Despite the existence of such plans, the Government Accountability Office criticized DHS's LEP engagement in 2010.⁶ To date, these agencies' LEP plans remain inadequate and the implementation of those plans, which do not even provide minimal protection for non-English speakers, remains incomplete.⁷

² Kelly Hallman et al., *Indigenous Girls in Guatemala: Poverty and Location*, in EXCLUSION, GENDER AND SCHOOLING: CASE STUDIES FROM THE DEVELOPING WORLD, ed. Maureen A. Lewis and Marlaine E. Lockheed 146 (Washington, DC: Center for Global Development, 2007); Luis Enrique Lopez, *Reaching the Unreached: Indigenous Intercultural Bilingual Education in Latin America*, UNITED NATIONS EDUCATIONAL, SCIENTIFIC, AND CULTURAL ORGANIZATION 4 (2010); see also *Caracterización Sociolingüística y Cultural de Comunidades y Escuelas*, Gobierno de Guatemala, Ministerio de Educación, 10-11 (2015), available at http://www.mineduc.gob.gt/DIGEBI/documents/Investigaci%C3%B3n/PRESENTACI%C3%93N_RESULTADOS_CHARACTERIZACI%C3%93N_2010_a_2014.pdf (showing that based on a 2010-2014 national survey of 60% of schools in Guatemala, 64% of indigenous students are monolingual or non-Spanish speaking)(last visited Nov. 25, 2015).

³ See e.g. *Indigenous Women & U.N. System Good Practices & Lessons Learned*, Secretariat of Permanent Forum on Indigenous Issues for Taskforce on Indigenous Women/Interagency Network on Women and Gender Equality, chp 3, (2007); Hallman, *supra* note 3, at 146.

⁴ 42 U.S.C. 2000d *et seq.* (prohibiting discrimination on the basis of race, color, or national origin in any program or activity that receives federal financial assistance); Executive Order 13166 Improving Access To Services For Persons With Limited English Proficiency, <http://www.lep.gov/13166/eo13166.html> (last visited Nov. 25, 2015) (requiring each federal agency to “examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening the fundamental mission of the agency.”). See also *Lau v. Nichols*, 414 U.S. 563, 569 (1974) (interpreting “national origin discrimination” to include failure to provide information in languages other than English to persons with limited English proficiency).

⁵ For links to federal agency LEP guidance documents and language access plans, see Federal Agency LEP Guidance, http://www.lep.gov/guidance/guidance_Fed_Guidance.html#DHS (last visited Dec. 10, 2015).

⁶ See DHS Needs to Comprehensively Assess Its Foreign Language Needs and Capabilities and Identify Shortfalls, GAO Report to the Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Committee on Homeland Security and Governmental Affairs, U.S. Senate, 2010, pgs. 32, 40, 41. <http://www.gao.gov/assets/310/305850.pdf> (last visited Nov. 16, 2015).

⁷ See e.g. Blake Gentry, *Exclusion of Indigenous Language Speaking Immigrants in the U.S. Immigration System*, A Technical Review (2015) available at http://www.amaconsultants.org/uploads/Exclusion_of_Indigenous%20Languages_in_US_Immigration_System_19

U.S. Customs and Border Protection (CBP)

Misidentification of indigenous women as Spanish speakers

CARA Project staff and volunteers regularly conduct intake interviews with mothers and children detained at the family detention centers in Dilley and Karnes. During those intake interviews, we review a family's immigration documents and discuss the circumstances of their entries into the United States. These interviews have revealed that CBP agents routinely misidentify indigenous women's primary language as Spanish and incorrectly report that indigenous women understood interrogations conducted in Spanish. Moreover, CBP officials routinely record admissions allegedly made by indigenous women who could not possibly have understood questions asked in Spanish – statements that can undermine their ability to obtain relief in the United States. As discussed further below, this misinformation has, in some cases, resulted in the erroneous removal of bona fide asylum seekers.

Lack of written materials in indigenous languages

While DHS's Language Access Plan (LAP) obligates it to "translate crucial documents into the most frequently encountered languages,"⁸ CBP officers only have materials in four indigenous languages (Kanjopal, Quiche, Kachiquel, and Mam),⁹ making it virtually impossible for them to communicate with speakers of over twenty-five other regional languages including Q'eqchi and Yucatec Maya (the second and third most commonly spoken indigenous languages in the region). Notably, CBP's own Limited English Proficiency plan makes no mention of any materials being available in indigenous languages.¹⁰ Consequently, during their first interaction with the U.S. government, many indigenous language speakers do not receive written materials that they can understand. Additionally, many of the written materials currently utilized by CBP, including the "I Speak" series, do not account for educational norms of indigenous language speakers, many of whom do not read or write their language.¹¹

Erroneous deportations of indigenous mothers and children who are unable to communicate their fear to officials.

CBP's failure to correctly identify the primary language spoken by indigenous asylum seekers, along with its practice of conducting interrogations in a language these women do not fully understand, has led to the erroneous deportation of families seeking protection in the United States, returning them to life-threatening situations in their home countries.

[June2015version_i.pdf](#) (last visited Nov. 16, 2015) [Hereinafter "Exclusion of Indigenous Language Speaking Immigrants"].

⁸U.S. Department of Homeland Security, Language Access Plan, 3 (Feb. 28, 2012), available at <http://www.dhs.gov/sites/default/files/publications/crcl-dhs-language-access-plan.pdf> (last visited Dec. 5, 2015).

⁹See e.g., Exclusion of Indigenous Language Speaking Immigrants at 13.

¹⁰See U.S. Department of Homeland Security, Customs and Border Protection, Draft Language Access Plan (Sept. 2014), available at https://www.dhs.gov/sites/default/files/publications/draft-cbp-lep-plan_0.pdf (last visited Nov. 25, 2015).

¹¹See Exclusion of Indigenous Language Speaking Immigrants at 8.

For example, CARA Project client **Inez** never told CBP agents she was afraid to return to Guatemala because officials never asked her this question in a language she understood. An indigenous speaker of Akateco, Inez was detained for twenty days in September 2005. Not once in those twenty days did a CBP official or interpreter speak to her in Akateco, her primary language. As Inez reported to CARA in a sworn statement, CBP officials instead spoke to her only in Spanish. Not one CBP official told her she could ask for an Akateco interpreter, and she was never interviewed about the circumstances that led her to flee Guatemala. After twenty days, Inez was summarily deported.

In 2015, when Inez was forced to return to the U.S. because she faced gender-based threats, the language access issues affected not only her, but her children who were detained alongside their mother at the Dilley detention center.¹² When Inez re-entered the United States, her prior removal order was reinstated. Although she passed her reasonable fear interview and thus became eligible for withholding of removal, current U.S. policy categorically denies eligibility for asylum to individuals subject to reinstatement. This policy is problematic for a number of reasons. Asylee status, unlike withholding of removal, which is the only relief available through the reasonable fear process, allows for family reunification, social services, and financial assistance for a temporary period, along with a path to permanent residence and eventually, U.S. citizenship. Many women are forced to flee their home countries without all of their children, and those who receive withholding rather than asylum may face lifelong separation from the children left behind in the country of origin.

Another mother, CARA Project client **Mabelle**, a Kanjobal speaker from Guatemala, was able to communicate only her name and country of origin in Spanish when CBP apprehended her at the border in October 2015. However, CBP officials proceeded to interview her, incorrectly transcribed the interview, and concluded that she had no fear of return to Guatemala. After being in CBP custody for three days and two nights, Mabelle and her daughter Sara were taken to the Dilley detention center.

U.S. Immigration and Customs Enforcement (ICE)

Inconsistent access to indigenous-language interpreters and failure to translate written documents into indigenous languages

Without consistent access to interpreters and translations of written documents, detained indigenous mothers are forced to communicate in poorly-understood Spanish or to pantomime with ICE officials, other detention personnel, and medical staff charged with their family's physical well-being. Moreover, their children do not understand the classes taught at the centers' schools. Such language barriers cause confusion, intensify suffering, and may prolong these families' stay in the detention centers, which can harm them both physically and emotionally.¹³ Linguistically speaking, these women and children live in virtual solitary confinement.

¹²Other women like Inez often return to the U.S. within days, weeks, or months of their deportation due to the continuing life-threatening situations in their home countries. After a second (or third) interaction with CBP proves more productive, their prior removal orders are generally reinstated. See 8 U.S.C. § 1231(a)(5).

¹³The American Immigration Council, the American Immigration Lawyers Association, and the Women's Refugee Commission filed a [complaint on June 30, 2015](#), detailing the negative mental health ramifications of detention for both mothers and children fleeing violence in Central America. American Association of Pediatrics letter to DHS

Elana's story is emblematic of this problem. When Elana and her two-year-old son first arrived at the Dilley detention center after being detained on August 26, 2015, she informed officials that she spoke Mam, an indigenous Mayan language spoken by half a million Guatemalans, and that her religion was Mam. But during the three weeks that she and her two-year-old son spent in detention, neither ICE nor Corrections Corporations of America (CCA) (the private prison contractor operating the Dilley detention center) staff communicated with her in Mam. ICE never found a Mam interpreter for Elana or gave her any documents written in Mam. Instead, ICE officers explained the immigration process to her in Spanish, which she could barely understand. She communicated with her deportation officer largely through pantomime. ICE officials, in turn, did not understand Elana when she asked them in Mam for her immigration documents, and so she went without this important paperwork for days. This delay impeded her attorney's ability to represent her and extended her time in detention.

Even when interpretation is available, indigenous language speakers are often detained longer than Spanish speakers. **Noemi** and her eleven-year-old child were detained at the Karnes detention center in late September 2015. After this, she was given a credible fear interview in her native language, K'iche. However, she had to wait longer for the results than her Spanish-speaking counterparts. When ICE finally called Noemi into a meeting to discuss the positive results of her interview and the terms and conditions of her release, no interpretation was available. Consequently, the meeting was adjourned and she was forced to wait five additional days, until interpretation became available, for the results of her credible fear interview.

In some instances, CARA Project staff and volunteers witnessed or received reports of the use of children or other residents in communications between ICE or CCA officials and detained indigenous language speakers. Of course, such interpretation in the context of individuals applying for asylum, withholding of removal, or protection under Convention Against Torture are completely inappropriate. Mothers resist sharing details of abuse, torture, sexual assaults, and humiliation with their children; children and teenagers withhold such information from their parents. It is also possible that members of one family may be, or have been, involved in the persecution of another family's members, who are detained in the same ICE detention center. Confidentiality must be an essential aspect of claims for asylum or related claims for refugee status.¹⁴ Although USCIS has made very clear that family members or friends will be used as interpreters only as a very last resort, this arrangement is very problematic. If no other interpreter is available, DHS should issue Notices to Appear rather than subjecting these families to the expedited removal process without adequate interpretation.

Additional barriers in accessing medical treatment

Secretary Jeh Johnson, July 24, 2015, available at <https://www.aap.org/en-us/advocacy-and-policy/federal-advocacy/Documents/AAP%20Letter%20to%20Secretary%20Johnson%20Family%20Detention%20Final.pdf> (last visited Dec 7, 2015); Luis Zayas and Aimee Miller, Special to the Statesman, *Immigrant Detention Centers Harm Childrens' Mental Health*, The Statesman (Aug. 13, 2015), available at <http://www.statesman.com/news/news/opinion/immigrant-dentention-centers-harm-childrens-mental/nnJQp/> (last visited Nov. 11, 2015).

¹⁴See 8 C.F.R. § 1208.6(a).

Indigenous women and children have sometimes had difficulty communicating their symptoms to medical personnel and understanding prescriptions or medical instructions. Access to medical care in family detention centers is already inadequate,¹⁵ and these problems are compounded with indigenous families because few medical staff speak indigenous languages.

Elana and her toddler son were detained at the Dilley detention center from August 26 to September 14, 2015. When she brought her toddler son to Dilley's medical center, medical staff conducted her and her toddler son's medical check-ups in Spanish, a language that neither of them understood. The staff administered five shots to Elana's son without her consent, explaining the name and purpose of these vaccinations only in Spanish. On a separate occasion, when Elana went to the clinic to ask if her son was sick, the staff responded in Spanish that her son was fine; if they offered any more details, she did not understand them.

Noemi, a woman detained at the Karnes detention center from late September until mid-November 2015, was never provided a K'iche interpreter and relied entirely on her eleven-year-old son to interpret her conversations with the medical staff. Noemi had her blood drawn upon entering Karnes and was later told that the medical staff needed to draw her blood again, but she never understood why. The medical staff also explained, through her son, that he needed to be vaccinated. Again, Noemi did not understand why. Without proper interpretation, Noemi was unable to fully consent to these medical procedures for herself or her son.

Finally, meaningful access to mental health care is unavailable for indigenous women and children. Indigenous families are especially likely to be suffering from Post-Traumatic Stress Disorder (PTSD) or other mental illnesses as a result of trauma in their home countries and ongoing trauma in detention where they are severely isolated.¹⁶ For example, **Carolina**, who was detained at the Dilley detention center from February 22, 2015 to August 1, 2015, an extremely long time as a result of language-related delays, suffered from clinical depression as a result of the prolonged period she spent in detention.

Denial of educational opportunities

Children in immigration detention are entitled to education.¹⁷ However, current practices within family detention centers for ensuring indigenous language-speaking children access to education are unevenly implemented and contradict ICE's own policies. ICE's Family Residential Standards require that all children who are detained and eligible for educational

¹⁵The CARA Project has previously filed two complaints, on behalf of thirty-two immigrant families detained at Dilley, Karnes and Berks, County, PA, highlighting concerns regarding inadequate medical care at all three facilities, one on July 30, 2015, available at <http://www.aila.org/advo-media/press-releases/2015/deplorable-medical-treatment-at-fam-detention-ctrs>, and October 6, 2015, available at <http://www.aila.org/advo-media/press-releases/2015/crcl-complaint-family-detention>.

¹⁶See e.g. K. O'Connor, C. Thomas-Duckwitz, G. Nuñez--Mchiri, *No Safe Haven Here: Mental Health Assessment of Women and Children Held in U.S. Immigration Detention*, Unitarian Universalist Service Committee, October 2015, available at http://www.uusc.org/sites/default/files/mental_health_assessment_of_women_and_children_u.s._immigration_detention.pdf (last visited Nov. 25 2015).

¹⁷See *Plyler v. Doe*, 457 U.S. 202 (1982)(states cannot constitutionally deny children a free public education on account of their immigration status); see also *Reno v. Flores*, 507 U.S. 292, 298 (1993)(mandating detention facilities provide services that comply with child welfare standards, including education).

services receive an individual educational needs assessment within three days of arrival at the detention center.¹⁸ The individual needs assessment must be provided in the child's primary language. If an interviewer is not conversant in the language, an interpreter and telephonic services must be used.¹⁹ Additionally, linguistically appropriate educational materials should be provided for the children.²⁰ Despite all this, however, education provided at the family detention centers is conducted only in English and Spanish, leaving indigenous children confused and without any meaningful educational opportunities.

For example, **Inez** attested that her children “do not know very much Spanish and even less English . . . [but] all of their schooling [in detention] is in Spanish.” In Guatemala, Inez's children attended school in their native language, Akateco, with just one hour of Spanish instruction each day. As a result at the STFRC, Inez explained that it was, “very difficult for them to learn.” While detained, Inez posited, “Maybe they are learning. But I don't know because they aren't able to answer anything because nothing is in our language.”

Ariela is an Akateco-speaking mother from Guatemala who was detained at the Dilley detention center with her six-year-old son from September 20, 2015 to October 31, 2015. During that almost six-week period, her son struggled in school. He spoke no Spanish, and his mother was not even able to explain what he did in the school at the STFRC.

Failure to explain conditions of release, including ankle monitors

The documents that indigenous families receive upon release are often in English and occasionally in Spanish. These documents include technical legal language incomprehensible even to some attorneys.²¹ As a result, indigenous families stand little chance of understanding that they must charge their electronic ankle monitors, how to go about charging the monitors, how long they will have to wear the ankle monitors, and the consequences of an accidental violation of ankle monitor policy.

In late October 2015, for example, **Alvera**, a Quiche-speaking mother from Guatemala held at the Dilley detention center with her seven-year-old daughter, unknowingly signed papers consenting to release on an electronic ankle monitor. Around 9 pm, four ICE officials called Alvera, along with eight or nine other women, into a playroom. There, they explained to Alvera and the other women, including one Mam speaker who also did not understand Spanish, that they had to sign papers in order to leave. Alvera felt confused and scared and did not know what she was signing. However, anxious to be released from detention with her child, she signed the papers anyway. Alvera later learned that by signing the papers, she had inadvertently consented to wear an ankle monitor. Since her release, Alvera has worried that people in her community will think that she is a criminal. Because she did not understand her options, she never had an opportunity to exercise her right to a bond hearing before an immigration judge in lieu of accepting release on an ankle monitor.

¹⁸ See ICE Family Residential Standards, Education Plan at IV. 2. (a) https://www.ice.gov/doclib/dro/family-residential/pdf/rs_educational_policy.pdf.

¹⁹ *Id.* at IV 2 (e).

²⁰ *Id.* at IV 4 (b).

²¹ Advocates raised this issue at the August 28, 2015, White House Office of Public Engagement Access to Counsel Stakeholder Meeting for unaccompanied minors and families.

U.S. Citizenship and Immigration Services (USCIS)

Lack of interpretation or inadequate interpretation during interviews with asylum officers

Asylum officers sometimes interview indigenous language-speaking mothers in Spanish. In some cases, this occurs because CBP misidentified a woman as Spanish-speaking and ICE never corrected the error. In other cases, it occurs despite a woman having been correctly classified as an indigenous language speaker. Mothers are presented with the choice of proceeding with an asylum interview in Spanish or waiting in detention with their children, potentially for several weeks, so that the asylum office can secure an appropriate interpreter. Faced with this choice, many mothers proceed with the interview, which — predictably — often results in a negative credible or reasonable fear determination. Where a Judge affirms a negative determination in a case involving an indigenous language speaker who did not have an interpreter, the CARA Project generally submits a request for reconsideration and re-interview with USCIS. The results of such re-interviews, with appropriate interpretation, are overwhelmingly positive. Nonetheless, the effect of this process is to extend the time a family spends in detention.

Some indigenous families never receive credible or reasonable fear interviews because USCIS cannot find qualified interpreters. For example, **Catherin**, a Kanjobal speaker from Guatemala, was detained at the Dilley detention center with her fourteen-year-old son from October 25 to November 7, 2015, and then released with a Notice to Appear without ever being interviewed. Similarly, **Mabelle**, another Guatemalan Kanjobal speaker, was detained on October 10, 2015, with her four-year-old child and waited more than two weeks at the Dilley detention center before DHS issued a Notice to Appear, which prompted their release. Another mother, **Nathalia**, a Quiche speaker from Guatemala, was detained at the Dilley detention center with her seven-year-old child from October 18 to November 1, 2015, without ever undergoing a credible or reasonable fear interview. A Mam-speaking mother from Guatemala, **Rosa**, was detained at the Dilley detention center with her two-year-old son from September 22 to October 23, 2015. DHS took more than a month to issue a Notice to Appear and never secured an interpreter for the credible fear interview.

Other families move forward with a credible or reasonable fear interview with inadequate interpretation. One father, **John**, detained at the Berks detention center since September 8, 2015 with his one-year-old daughter, is an Achi speaker from Guatemala. The asylum office conducted John's credible fear interview in Quiche, rather than Achi, although the relevant documentation indicates that it was conducted in Spanish. Unable to properly communicate his fear of return, John received a negative determination. He was unrepresented until October 27 2015, when the immigration judge who reviewed his case asked an attorney for another detainee if she would represent John. At this hearing, once again, a Quiche interpreter was provided. The immigration judge did not rule on the case because the Record of Determination/Credible Fear Worksheet (Form I-870) from the asylum office did not include the proper legal analysis. Thus, this family remains in legal limbo while the immigration judge awaits additional paperwork from the asylum office. Meanwhile, John's pregnant wife, who speaks very little Spanish, is detained at the El Paso processing center, where she faces similar language barriers.

A very recent example of inadequate interpretation comes from another CARA Project client who, as of this writing, is detained at the Dilley detention center with her four children, ages four, five, nine, and thirteen. **Eliana**, a Guatemalan Mam-speaking mother, and her children have been detained for more than a month, since November 6, 2015. Eliana's credible fear interview on November 18, 2015, lasted for four hours. The first two hours were spent on introductions because the asylum officer spoke to a telephonic Spanish speaker, who in turn spoke to a Mam interpreter, who then communicated with Eliana. The interview transcript revealed clear communication difficulties, including multiple occasions when Eliana asked for a different interpreter because she could not understand the dialect of Mam that the interpreter was using. Eliana explained that she only understood "some words," and her interpreted answers were often awkward or disjointed, strongly suggesting miscommunication in both directions. At two points of the interview, the interpreter service was disconnected, first for twenty minutes and then for five minutes. The asylum officer also interviewed Eliana's eldest child, who also said he did not understand the Mam dialect used by the interpreter. Although this family is genuinely afraid of being returned to Guatemala where they face gang violence, they have been unable to articulate their fear due to inadequate interpretation. Eliana's request for a re-interview has been denied, and she is scheduled for deportation on Friday December 10, 2015. This is the second time that Eliana has unsuccessfully sought protection in the United States; she first fled to the U.S. in 2013, but was deported because she was similarly unable to express her fear of return to Guatemala due to inadequate interpretation.

Other cases are delayed at different points in the system. **Claudia**, a Quecha speaker from Peru, was first detained with her nine-year-old daughter on September 29, 2015 and held at the Dilley detention center. Although she had her credible fear interview on October 7, 2015, her immigration judge review was not scheduled until October 27, 2015. The immigration judge quickly vacated the asylum officer's negative credible fear determination.

Recommendations:

The following recommendations are intended to address the problems described above. DHS should:

- (1) Provide qualified interpreters for all indigenous language speakers, either by phone or in person, at the time of apprehension and during any period of detention.
- (2) Provide translations of written materials that are reflective of literacy and education levels in the following languages: Akateco, Kanjobal, Quiche, Kekchi, Mam, Maya, Popti, Achi, Garifuna, Kaqchikel, Chuj, Ixil, and Lenca. Undertake a comprehensive review of the availability of interpreters in the above-referenced languages.
- (3) Appoint counsel for indigenous language speakers who would otherwise be unrepresented at any stage of the removal process.
- (4) Indigenous language speakers identified at apprehension should be immediately released with a Notice to Appear. Families released by CBP should be given clear instructions on when and where to appear in court.
- (5) Where indigenous language speakers have been issued *in absentia* removal orders, DHS should move to reopen those orders.

- (6) End the inhumane and problematic practice of detaining immigrant children and their mothers, which would resolve many of the problems described in this document.

Given the pervasive and troubling concerns highlighted in this complaint, we urge your offices to undertake swift and comprehensive reviews of the language access policies for indigenous language speakers held in family detention centers. While modifications and improvements to the current system of detaining families are urgently needed, nothing in this complaint should be read to undermine our longstanding position that there is no humane way to detain children and their families.

Karen S. Lucas
American Immigration Lawyers Association

Lindsay M. Harris
American Immigration Council

Amy Fischer
Refugee and Immigrant Center for Education and Legal Services

Ashley Feasley
Catholic Legal Immigration Network

Complainant #1: “Jessica”¹ Jessica is a 29-year-old mother of two who fled Honduras after the M-18 gang targeted her as a woman living without a male protector. Jessica and her two children, ages 4 and 6, received the varicella vaccination approximately five days after arriving at Dilley. When Jessica advised medical staff that her children had already received the varicella vaccination in Honduras, she was told that everyone detained at the facility had to get the vaccination. On July 1 or 2, two officials woke Jessica and her young children at 4:30 am and told them to go to the chapel for a medical appointment at 5 am, where they waited for two hours before being seen. Jessica took her children’s vaccination cards with her to show the officials that their vaccinations were current. A uniformed official told Jessica that her children were still missing vaccinations, although he did not specify which vaccinations needed to be administered. Shortly afterward, women wearing white gave Jessica’s son and daughter vaccinations, but did not tell her which ones or provide any documentation containing that information. The next day, around 5:30 am, two officials woke the family and asked if the children had any fever or other problems. After Jessica indicated that the children were fine, the officials left.

When Jessica was forced to flee Honduras, she had been recently diagnosed with breast cancer. At Dilley, Jessica went to the clinic to try to speak to a doctor about her medical concerns. After waiting for five hours, in pain, in a cold room, clinic staff told Jessica that the doctors were there to see the children and there was nobody there to see her. She did not receive any pain medications. That night, a staff member told Jessica that a specialist would attend to her the next day. The following day, Jessica inquired at the medical clinic about the specialist, but an officer and a nurse confirmed that there was no specialist and sent her back to her room without any medicine. The next day Jessica had a headache so painful that she was vomiting, but having lost hope in the clinic, she decided not to return to attempt to seek treatment because she did not want to wait in the cold room and be turned away again. Jessica later suffered from vomiting for nine days, non-stop. When she first started vomiting, she waited to see the doctor for six hours without being seen. She returned, after seven days of vomiting, and waited seven hours to see the doctor. Jessica has lost thirteen pounds since being detained.

Complainant #2: “Mira.” Mira is a 22-year-old Salvadoran woman detained with her three children, ages 6, 4, and 2. She is engaged to a U.S. citizen and had planned to enter the U.S. legally, but was forced to flee suddenly when gang members threatened her life in El Salvador. Before Mira even arrived at Dilley, she was held for a week by CBP and was sick, vomiting, and unable to eat, but refused medical care upon her request. At 5 am on June 30, CCA officials at Dilley woke Mira and informed her that her children had to go to a doctor’s appointment. When Mira asked why, the officials did not respond, instead ordering her and her children to follow him. The official led them to a place outside the communal bathroom where more than 20 other mothers and children were gathered, having also just been woken up. The official then led the group to the chapel, which was filled with women and children. Mira learned from other women that the children were going to receive vaccinations. After they had waited for almost five hours, medical staff informed Mira and the other women that the vaccines were mandatory and handed them a list of vaccines the children would receive. When Mira informed medical staff that her children had already received all of the listed vaccines, the doctor told her that they would be administered again. Within two or three days, Mira’s two-year-old child was vomiting, with a

¹ Pseudonyms are used to protect the identities of the mothers submitting this complaint. Full names and Alien registration numbers will be provided concurrently with this complaint to CRCL and OIG.

high fever and a terrible cough. Mira has tried three times to take him to the clinic, but has been repeatedly told that she could not see a doctor without an appointment and advised to return the next day.

Complainant #3: “Irena.” Irena is a 27-year-old woman from El Salvador who fled after gang members threatened to cut out her tongue because they believed she was reporting their activities to the police. She and her two-year-old son Oscar are detained at Dilley. Officers woke Irena and Oscar at 5:30 am and ordered them to go to the medical clinic. There, Oscar received five vaccinations. Although Irena told the officer that her son was up to date on his vaccinations, the officer responded that there was no way to prove that and her son thus needed to get all of the vaccinations. A nurse roughly administered the vaccinations into Oscar’s leg. After the vaccinations, he could not walk. That night, he spiked a high fever. Irena did not take him to the clinic because she had heard from other women that the clinic staff would not do anything for a child with a fever following vaccinations. After a few days, a nurse came early in the morning to see if any children had developed fevers following the vaccinations and indicated that the children had received an adult dose of one of the vaccines. Later that day, Oscar developed a problem with his eyes. He cried and rubbed his eyes, unable to sleep. When Irena took him to the clinic, the doctor said his eye problem was viral and had nothing to do with the vaccinations. Since receiving the vaccinations, Oscar has eaten very little.

Complainant #4: “Lillian.” Lillian fled Honduras after a gang beat her 10-year-old daughter and threatened both of their lives. She arrived at Dilley with ten-year-old Rosa on June 3, 2015. After a six-hour bus journey and waiting eleven hours to be showed to her room, Lillian got on her knees to pray, but around 8 pm she fainted. She awoke in a hospital, receiving intravenous fluids and oxygen. A cardiologist and neurologist examined her and she underwent various tests. Upon discharge from the hospital, Lillian received her medical records. Returning to Dilley at 4 am, she was transported directly to the medical clinic, where she handed over the papers she received at the hospital. Lillian was returned to her room with sleeping medication and woke up later that day to see the doctor. Lillian asked the doctor for her medical records and the doctor told her that she “did not need them” because the medical results were “fine.”

On Thursday June 25, an official came to Lillian’s room at 6am and woke her for a medical appointment at 9 am with a doctor. That day, Lillian and Rosa waited about 14 hours to see the doctor, with Rosa missing school. At 11 pm that night, Lillian told clinic officials that she needed to take Rosa, who had fallen asleep, to bed. She was told that her doctor’s appointment would be rescheduled, but she never actually received another appointment. Lillian felt light headed and dizzy for the next five days until she fainted again on June 30. She awoke in the medical facility at Dilley, unable to speak or move. Lillian remembers medical personnel pounding her chest repeatedly and telling her to stay awake. For a week afterwards, Lillian’s chest was swollen and bruised and ten-year-old Rosa applied cream to her mother’s chest.

During this same incident on June 30, in an attempt to give Lillian intravenous fluids, two medical personnel pricked Lillian with a needle seven times and laughed each time they were unsuccessful locating a vein. Lillian cried out in pain for them to stop. Despite her request for them to stop, the women continued and found a vein in her other hand and inserted a tube with fluids. Lillian was then wheeled on a stretcher to an ambulance, where the EMT immediately took out the tube and showed Lillian that the needle was bent, saying “look what they did to you,” telling her that the two women did not know how to insert the tube. At the hospital Lillian

again received treatment from a cardiologist and neurologist, underwent various tests, and received oxygen. At one point a nurse handed Lillian paperwork, explaining that the doctor at Dilley would explain the results to her. When Lillian was brought back to Dilley, she saw a doctor who asked for the hospital paperwork. The doctor threw the papers on top of a black bin on the floor by a desk. Lillian asked if she could keep the papers because she may need them and tried to pull the papers out of the bin. The doctor then seized the papers, placing them behind her computer out of Lillian's reach. Lillian explained to the doctor that she was still having severe headaches, the right side of her face would become swollen, her right eye red, her left arm felt like pins and needles, and her hand become pale with purple spots on the palm. The doctor told Lillian she needed to see a psychologist.

Lillian has seen a psychologist on four occasions since arriving at Dilley, each time for around only ten minutes and each time in the presence of her ten-year-old daughter. Lillian desperately wanted to share what she was feeling with the psychologist but felt inhibited by the presence of her daughter, who would cry if Lillian started to tell her story. Lillian asked if her daughter could play outside the consultation room but the psychologist told Lillian that she needed to stay in the room and gave Rosa some gum to try to calm her down.

Lillian's concerns for Rosa are mounting. Rosa has asked her mother why they cannot leave and asked "what if we die? Can we leave then?" Only ten years old, Rosa has told her mother that she will never forget this experience. Distraught and overwhelmed about the effects of detention on Rosa, Lillian went to the bathroom intending to slit her wrists with a razor. After this event, Lillian met for the fourth time with the psychologist. After disclosing her suicide attempt to the psychologist, Lillian and Rosa were held in isolation for three days. Rosa cried and begged to leave the room but the psychologist told her that she had to stay with her mother. Rosa was bored, angry, and sad in isolation and Lillian felt immense guilt for separating Rosa from the other residents in the facility because of her depression and suicide attempt.

A doctor visited Lillian when she was in isolation, telling her he wanted to talk to her about test results revealing a "black shadow" in the upper right side of her face, where her headaches originate. He explained that they wanted to do tests in the morning and would be drawing a lot of blood. Lillian asked why she needed tests when the other doctors had told her that the previous test results had been fine and the doctor said, "I don't know why they didn't explain the results earlier." The doctor examined Lillian and found extreme pain on the left side of her body, near her womb. He told Lillian that he would order a prescription for her and that the next day she would have blood drawn. No one showed up the next day to draw blood. A psychologist came the next day and inquired about the blood tests, and when the psychologist realized the tests had not occurred, she told Lillian the blood would be taken the next morning. Again, the next morning, no tests were performed.

Complainant #5: "Francisca." Francisca fled Guatemala after a gang threatened her and her daughter. While Francisca was detained at Dilley, she felt a sharp pain in her stomach and arrived at the medical clinic at around 3 am. She waited at the clinic for nearly six hours before finally being transferred, in extreme pain, to a hospital. At the hospital, the decision was made to immediately remove her appendix. Francisca knew her child was being cared for by an official, but was concerned about his welfare. Francisca's appendix was removed on June 14 and she was transferred back to Dilley the same day. Even immediately after this surgery, Francisca had to walk from her room to the medical clinic twice a day to receive her pain medications. Following

the surgery, she was running a high fever and constantly vomiting. She sought medical attention at the clinic, arriving at 9 am and was forced to wait for five hours to see a nurse, who told her to return to her room and drink water. The next day, Francisca felt even worse but had lost faith in the clinic, so did not return to the clinic for help because she knew she would not get any medical attention. Eventually, as her symptoms increased, she returned to the clinic and upon arrival fainted from exhaustion and sickness. She woke up in a bed and was told to go home and drink water.

Complainant #6: “Melinda.” Melinda is a 20-year-old mother who fled a lifetime of abuse in El Salvador, beginning with rapes and physical abuse at the hands of her stepfather as a young girl, and then an abusive relationship that she entered into at age eleven with a partner who beat her so badly that she miscarried and used his connections to the gangs to intimidate and control her. Melinda arrived at Dilley with a broken hand after a gang kidnapped, raped, and beat her constantly for five days. She fled after the gang threatened to kill her after she sought treatment at the hospital. On arrival at Dilley Melinda showed officials her broken pinky finger, sticking out to the left of her hand. Officials told her that it did not matter, that nothing was wrong, and that she should drink some water. Melinda decided to see the doctor anyway. The doctor did not examine Melinda, but looked at her hand, told her nothing was wrong, and that she should drink water. Melinda continues to experience pain in her hand. She is unable to move two of her fingers and they are bent in the wrong direction. She has extreme pain in her wrist and hand and has trouble sleeping and writing. At one point, Melinda sought medical treatment for her son, who recently turned 4 in detention, who was vomiting with a fever. After six hours of waiting to see the doctor, the doctor told Melinda that her son should drink water and that he should see a psychologist, because there was nothing physically wrong with him. A second time, Melinda took her son, who again was vomiting with a fever, to the clinic. She was advised that she would have to wait for six hours, which she knew would only make her son sicker, so she left, after being forced to sign a form saying that she refused medical attention for her son. Melinda’s son became so sick that he virtually stopped eating. She did not feel like she could take him to the clinic because she did not think she would get help and would only be told to have her son drink water. Her son wakes up from his sleep coughing. When she arrived at Dilley, her son weighed fifty pounds and now weighs only thirty-nine pounds.

Complainant #7: “Yaniret.” Yaniret is a 24-year-old mother fleeing threats of death in her native Honduras. Yaniret was detained with her five-year-old daughter, Cecilia, at Karnes for fifty-two days. Yaniret and her daughter suffered with inadequate medical treatment and indignity at Karnes that left her feeling powerless, eventually resulting in self-harm. In early May, Yaniret took her daughter to the clinic at Karnes because she noticed her daughter had a strange vaginal secretion. The doctor at Karnes told Yaniret he would take a swab from the outer areas of little Cecilia’s vaginal lips, but instead shoved a probe deep into her vagina. Cecilia screamed in pain. The same day, Yaniret and her daughter were taken to a clinic outside of the detention center. The doctor who examined Cecilia wrote a prescription for antibiotics for Cecilia’s infection. Back at Karnes, however, Yaniret was never able to access these prescribed antibiotics for Cecilia. She felt very upset about how little power she had over the health of her daughter.

At the end of May, GEO staff members took Yaniret and Cecilia to a different outside doctor to examine her infection. Cecilia refused to be examined, crying and hysterical, because she was

traumatized from the first doctor's rough handling and shoving of a probe into her vagina. In the first week of June, Yaniret spoke with a woman from the Honduran consulate who later accompanied Yaniret and Cecilia to another outside clinic. The doctor confirmed that Cecilia needed medicine and wrote a second prescription. Back at Karnes, however, Cecilia never received the prescribed medication. Several times Cecilia was told that she would be able to leave without a bond and several times ICE or GEO officials rescinded this offer. When Yaniret spoke with a journalist and showed her a diaper of Cecilia's secretion that was untreated, GEO staff members denied her food. Yaniret also spoke out when Congressional officials visited Karnes. Soon after this, she was assigned to another ICE deportation officer and her bond was set at \$8500, an amount Yaniret was unable to pay. As her daughter suffered in detention, Yaniret felt that "ICE and GEO were taking away my ability to be a mother." She was unable to obtain a new pair of shoes for GEO when little Cecilia's shoes wore through at the sole, and was forced to send Cecilia to school in socks. At one point, GEO staff members threw food at Yaniret. Feeling powerless and depressed, Yaniret resorted to self-harm. She fainted and was put in isolation in the medical unit. She was stripped naked against her will, wearing only a heavy green jacket. Yaniret asked the doctor to speak to her attorney and he responded that she could not talk to anyone. Yaniret remained in isolation, but could hear her daughter crying from a room nearby. The same doctor later referenced Yaniret cutting herself in front of her five-year-old daughter, understandably not something that Yaniret wanted little Cecilia to know.

Complainant #8: "Maria." Maria arrived at the Berks family detention facility as a 19-year-old mother, fleeing severe domestic violence and gang violence in Honduras. She was detained for over 11 months with her toddler, Flor. Maria suffered from a heart condition, which manifested while in detention. Although there are at least two medically documented instances where she fell unresponsive and had to be revived in detention; she never had a formal diagnosis nor was she given medication. For a period of time, Maria was required to carry a heart monitor with her throughout the detention facility. She was regularly dizzy and suffered with blurry vision, chills, and losing consciousness. On one occasion, she collapsed in the bathroom and fell unconscious, resulting in a black eye, swollen cheek, and severe contusions on her arms. After coming to, she was simply told to lay down and drink water, rather than being sent for care or tests.

Flor also suffered from numerous illnesses in detention. After 10 months in detention, she started vomiting large amounts of blood. When Maria took Flor to the clinic, she was told that her daughter was fine, and simply to drink hot or cold water. Flor continued to vomit for three days, and was never taken for external medical care or hospitalized. Blood stained her clothing, bed, and the floor. Other mothers at the facility, terrified by this situation, attempted to reach out to local lawyers for help. It was not until Flor was struggling to walk and had not eaten to days that she was finally taken to the hospital. Although Maria had requested yogurt as something her daughter might eat, she was told that she would need a prescription for special food. Flor received no further testing or follow-up care after her hospitalization. A Berks physician also determined that she did not need the medication prescribed by a doctor outside the facility. Eventually, after Maria's lawyer notified an external pediatrician who, upon hearing the story and seeing photos of the bloodstained shirt, called the state child abuse hotline. After this, Flor received another doctor's appointment and an appointment with a specialist, scheduled for a month after her final court hearing. She was released from Berks – after 11 months detention – when she and her mother were granted relief. They are now receiving care outside the facility.

Complainant #9: “Iliana.” Iliana was detained at Berks with her two-year-old daughter for over 9 months. After 4 months of detention she began to experience severe headaches and blackouts. She was brought to an eye doctor outside of the facility who determined she suffers from glaucoma and is legally blind and referred her for an MRI because the doctor sensed a more serious condition. It took several months and unexplained outside doctors’ visits before she was finally given a diagnosis of Chiari malformation, a brain condition where the spinal cord does not full cover the brain tissue. Iliana had already been diagnosed with Post-traumatic Stress Disorder, both by the in-house social worker and an outside psychiatrist. Despite these severe mental and physical health conditions, ICE refused to parole her. She also had some dental issues and was taken on a 4-5 hour trip to Philadelphia because the staff insisted that five teeth had to be removed at once, and could only find a dentist in Philadelphia willing to do so. Her face was very swollen from the tooth removal, and she could not eat or talk. It was while she was in that condition that ICE ultimately decided to release Iliana and her two-year-old daughter immediately.

Complainant #10: “Jocelyn.” Jocelyn fled from her native El Salvador when gangs targeted and threatened her. She was detained at Dilley with her two-year-old son, Luis, for more than 2 months. During her detention, Luis had diarrhea for 15 days that was not treated. Jocelyn sought medical attention for him for at least 7 straight days and each day she was turned away after a six or seven hour wait. She only saw a nurse once and was told just to have her son drink water. Her son also has ball of flesh on his arm which was bleeding and secreting puss and the doctors did not do anything about this. At Dilley, her son cried from the pain in his arm.

Declaration of [REDACTED]

A# [REDACTED]

I, [REDACTED], declare under penalty of perjury that the following is true and correct:

1. My name is [REDACTED]. I am 31 years old. I am currently detained in the South Texas Family Residential Center with my children: [REDACTED], A [REDACTED], 13 years old; [REDACTED], A [REDACTED], four years old; and [REDACTED], A [REDACTED], 3 years old.
2. I arrived at the United States on or about July 21, 2015, and turned myself and my family in to immigration officials.
3. The immigration officials kept us in a “hielera” and a “perrera” for about three days. While we were there, it was very cold. We had to sleep on the floor, and had only thin, aluminum foil blankets.
4. At the “hielera” and “perrera,” my children and I had colds and bad coughs, and were coughing phlegm. [REDACTED] and [REDACTED] especially suffered, as they are small children. We asked the immigration officers for help, and they gave us anti-allergy medicines. My head hurt, and I asked the officers for help, and they told me to sleep. But I could not sleep, because the “hielera” and “perrera” were full of many people, the officers were shouting all the time, and the lights were on all day and all night. The officers also separated my son [REDACTED] from myself, [REDACTED], and [REDACTED] while we were at the “hielera” and “perrera.”

5. My children and I were detained at Karnes for about a week.
6. My children and I arrived at the South Texas Family Residential Center on or about July 30, 2015. We are in a group that is being kept in quarantine for varicela and are isolated. However, my children and I do not have varicela, and no one in the group has varicela.
7. My son [REDACTED]'s legs hurt, and he has not received sufficient medical attention. [REDACTED] was in so much pain that he was crying and screaming and did not walk. He is three years old, but could not walk, and so I asked for a stroller to carry him. I took him to see the doctor, but the doctor's office was full. The nurse told me to wait. I arrived at the office at 9 a.m., and did not see anyone until 12 p.m. At 12 p.m., [REDACTED] did not receive any treatment for his leg. Instead, the nurse gave him vaccinations. The nurse put five vaccinations in his leg even though his leg was already hurting.
8. After the vaccinations, I kept waiting at the doctor's office to see a doctor or nurse because [REDACTED]'s leg still hurt. He was still crying and screaming. Finally, a doctor heard his screams and asked what was wrong, and then a pediatrician examined [REDACTED]. The pediatrician said that it was only growing pains, and gave [REDACTED] an ibuprofen. This helped [REDACTED] but then his leg began hurting again.
9. While I was waiting for someone to see [REDACTED], my head hurt, because [REDACTED] was in so much pain that he was crying and screaming. I asked a nurse for an aspirin, and the nurse asked the pediatrician, but the pediatrician did not give me anything. Instead, she laughed, and said, "Enough with the son!" She spoke in English, but I could understand what she said. That night, I had a migraine and my head and face hurt all night.
10. The next day, [REDACTED]'s leg was hurting again, and I went back to the doctor. That day, my older son [REDACTED] had his vaccinations, and the nurse gave him eight vaccinations at once.

At the same time, I was also waiting for someone to see [REDACTED]. In total, I spent about four and a half hours at the doctor.

I declare under penalty of perjury that the foregoing is true and correct, and that this document has been translated into Spanish for me.

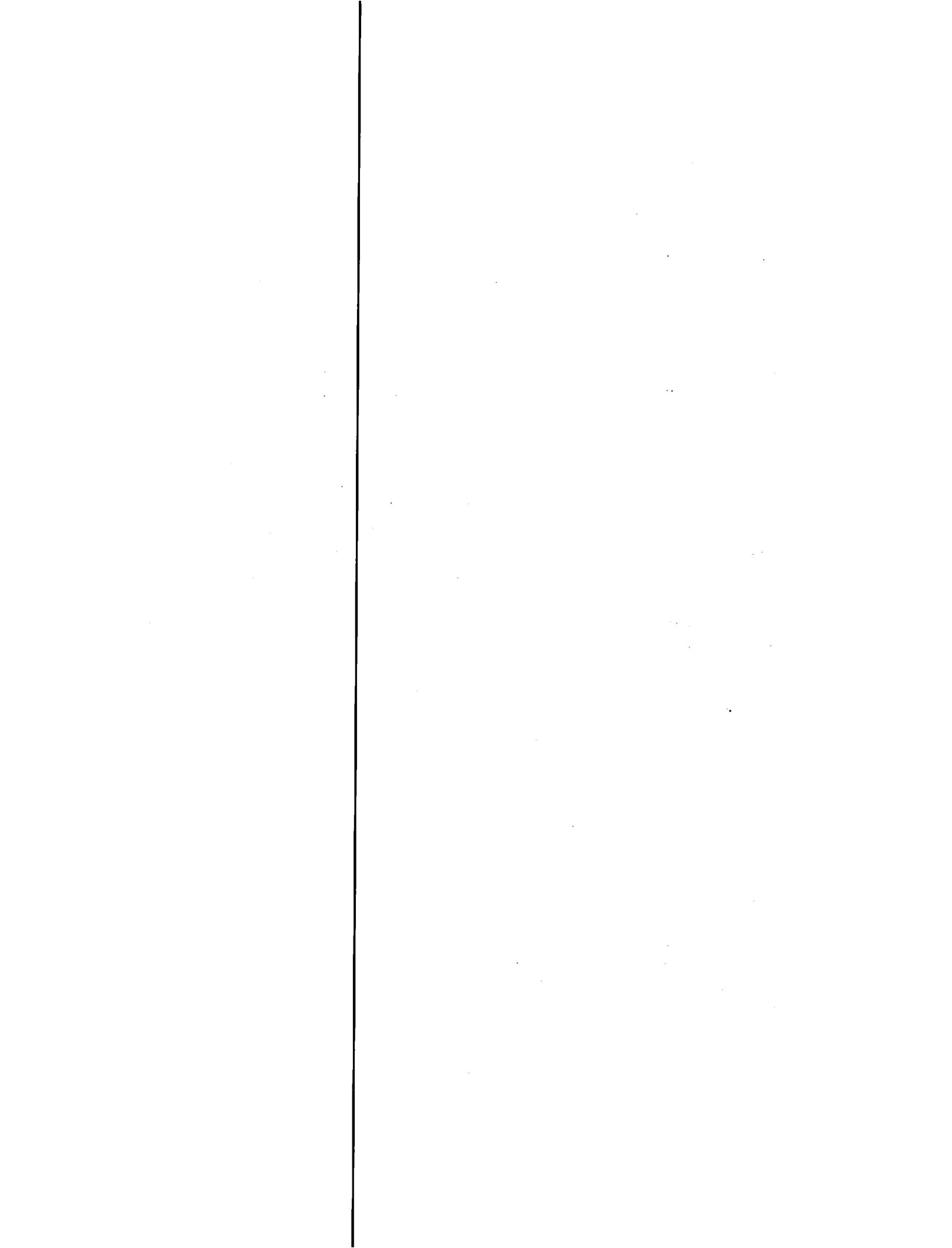
Executed on 10-8-2015





Declaration of [REDACTED] ([REDACTED])

1. My name is [REDACTED] ([REDACTED]), and I was born in El Salvador on [REDACTED]. I am currently detained in the South Texas Family Detention Center (STFRC) with my son [REDACTED] ([REDACTED]), where we have been since Sunday, July 17, 2016.
2. That day we arrived at the STFRC I noticed that my son was sick. A CCA guard that works near my room noticed that my son had an infection in one eye and suggested that we go to the clinic. I agreed that it was a good idea and he escorted us to the medical clinic in the STFRC.
3. We arrived at the clinic around 8pm, and we had to wait 30 minutes to be seen by medical staff. We were finally seen by a nurse, and she cleaned my son's eyes with water and told me that he would be seen by a doctor the next day. She gave me some gauze to help clean his eyes on my own.
4. The next day, Monday, my son and I had an appointment with the clinic at 9:30am. We had to wait about 45 minutes to be seen. When we were finally seen we met with a woman, but I'm not sure if she was a nurse or a doctor. This medical staff person told me that my son's condition was normal due the change in climate that we were experiencing, and that we had not been drinking enough liquids. She did not clean my son's eyes, nor administer any treatment, nor prescribe any medication. She told me they did not have anything that could help my son's eyes.
5. Later that same day I noticed that the infection was now in both of my son's eyes. I cleaned my son's eyes with the gauze that the clinic gave me.
6. On Wednesday, I met with the attorneys from CARA to prepare me for my legal case. They noticed that my son's eyes were very infected and requested that I be seen by the clinic again. The CCA guards escorted me to the clinic.
7. When I got to the clinic I had to wait three hours before I was seen, and then they sent me to the central clinic at the STFRC. There I met with who I think was a doctor, and she asked me to wait for 30 minutes so that they could get the medicine. Medical staff cleaned my son's eyes, and gave me a prescription for eye drops. She told me to administer one eye drop per eye every twelve hours. I went to the pharmacy and picked up the prescription and have been giving my son the eye drops myself since.
8. I do not understand why it takes so long for medical staff to attend to sick patients in the clinic. It seems like they are just walking around not doing anything. And then when we were finally seen, twice the medical staff didn't notice that my son had an eye infection, or at least they didn't have the medicine necessary to really address the problem.
9. The nurses don't seem to have the knowledge or the resources to attend to sick patients. It seems like only the doctors know how to help patients or have the medication to help sick patients in the STFRC. If they are going to put sick children in the STFRC they should be able to see them faster and give them the medicine necessary to take care of the illness that they have.



I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge and recollection:

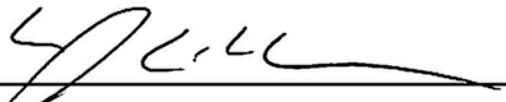




7/21/2016

Date

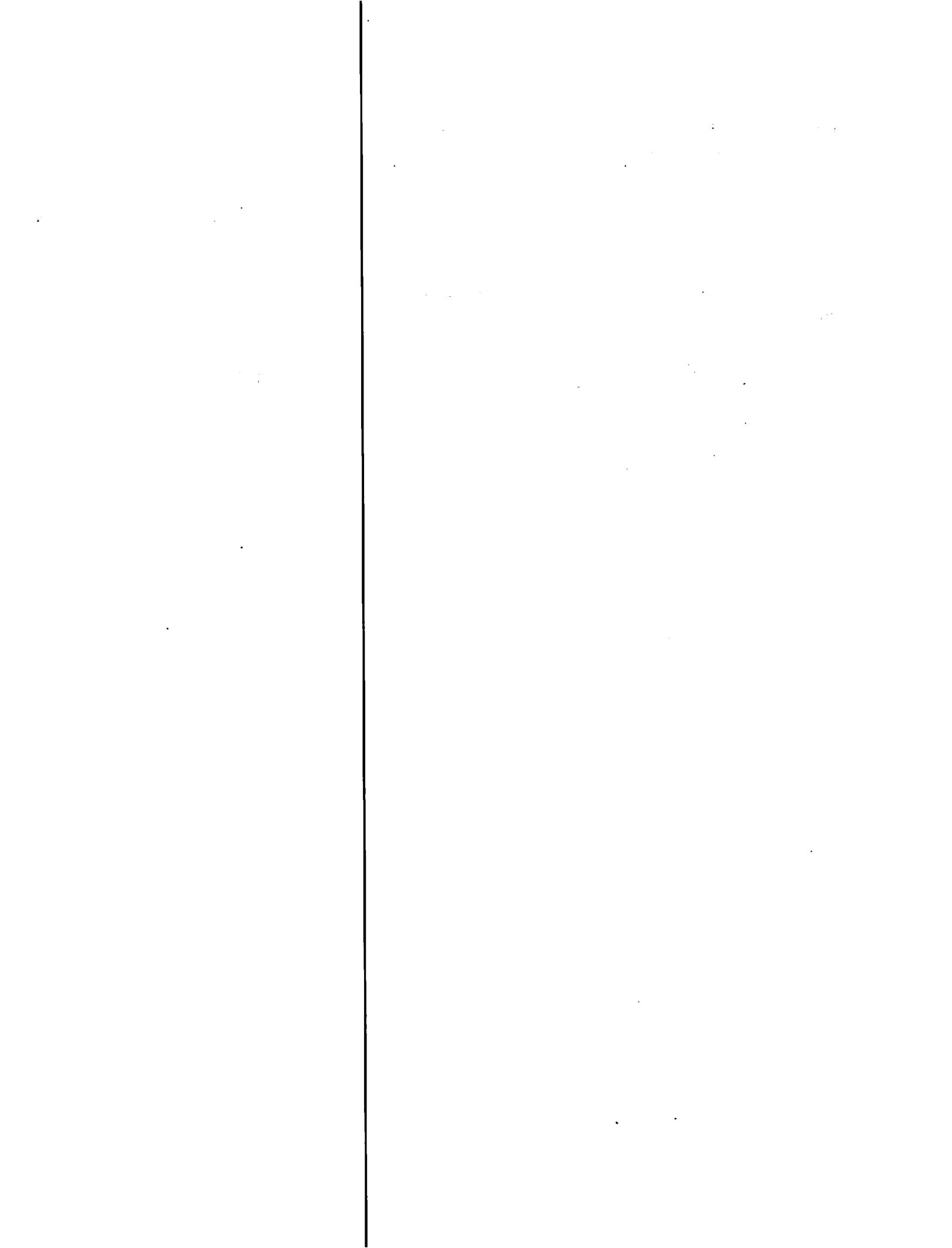
I certify that I am proficient in the English and Spanish languages and that the foregoing was read to  in Spanish.



Ian Philabaum

7/21/2016

Date



Declaration of [REDACTED] (A [REDACTED])

I swear under penalty of perjury that the following statements are true and accurate to the best of my knowledge:

1. My name is [REDACTED]. I was born in Honduras on [REDACTED]. I have one child, [REDACTED]. She was born on [REDACTED].
2. That I crossed the Mexico-USA border on July 30th with my daughter after fleeing terrible violence and threats in my country.
3. That after being caught by officers, I was aggressively being asked questions by an officer in Spanish while other officers laughed in the background. The questions were about my documents and I was accused of lying about not knowing other women who had been in the patrol car with me. I was utterly confused and in shock of the treatment I was receiving.
3. That on that same day my daughter and I were placed in a frozen place with a few other women for about 16 hours. People call it the 'hielera' or icebox. It was freezing cold and we were given no covers to stay warm.
4. After being taken out of the 'hielera', we were taken to another place. It was a huge cellar with equally freezing temperatures with fences all around. We learned of this place as the 'perrera' or dog kennel. We were given a small piece of aluminum paper to use as a cover.
5. Within hours of being here, my daughter told me that she had a lot of pain in her ear. I told an officer about it and the officer left. I began to insist with other officers to see if a doctor had been called. I was very worried because my daughter started to have pain in her throat and she had never in her life complained about such a pain.
6. Late in the afternoon, after asking many times, we were taken to another area of the building. We were finally able to see a doctor and my daughter was diagnosed. She had an infection in her left ear and in her throat.
7. She was given a warm drink and told that they were out of the medication [REDACTED] needed. I was worried.
8. Hours passed and it was time to leave the 'perrera'. As we were leaving, a paramedic told me that they had gotten the medicine my daughter needed and had put it inside my bags. I would be able to access it when we'd arrive at the South Texas Residential Family Center (STFRC). I was told it would be a 4 hour trip. My daughter was progressively getting worse.
9. Upon arriving at 10PM we went through a 6 hour process to be oriented and processed in. This included medical tests and I was relieved because I thought that this meant that my daughter would get the proper care she needed. I was wrong.
10. I took my daughter to the clinic the very next day but the doctors began asking us the same questions they had asked us the night before. I didn't understand why we were going through the same generic processing instead of asking about her specific conditions. I tried telling the doctor about all the conditions that she had been suffering. He checked her and told me that her ear was fine but didn't seem to do anything about her throat. He gave me some topical cream for bug bites she had gotten, and two inhalers. I was frustrated. I knew my daughter was not okay and she had never had asthma.
11. I asked the doctor about the medicine I had been told would arrive with me at the 'perrera' but he seemed to not understand what I needed. He told me that he would prescribe me some medicine himself but when I arrived at the pharmacy, per his suggestion, I was given a liquid for [REDACTED] to drink. I was under the impression that I would be given antibiotics.
12. I gave [REDACTED] the medicine but her cough got worse and worse. Although her ear pain subsided, I was concerned about her throat and how sore it was. I went back to the doctor but they told me that she was fine. I explained that [REDACTED] kept complaining about a pain in her throat but was told that this was normal and that I should give her water, honey, and that she should keep a healthy diet.
13. These measures were not enough and she started to develop a fever. I brought her to the doctor and was told to give her acetaminophen (11ml of it). I thought this made sense at the time. We left and she felt the

same. I comforted her by telling her that she would feel okay soon. We soon found out that effect was temporary. Although [REDACTED] would feel okay for a few hours, the fever kept coming back.

14. I kept going back to the clinic every 6 hours to get her the medicine but she was not feeling better and started to have greater pain in her mouth. Her mouth started developing sores inside and her molars started coming in.

15. I told the doctor that things were getting worse but they told me to be patient. The pain was greater and greater and I was told that she would not be able to see a dentist for another two weeks. She now had incessant fever, sores and ulcers in her mouth, and her teeth were being impacted by incoming molars causing her incredible pain.

16. My daughter started to change her behavior: she wasn't eating, laughing, or had any energy. She was tired all the time. She would cry and tell me that she wanted to feel better so that I wouldn't be worried. My daughter is everything to me and seeing her this was breaking my heart.

17. On Tuesday, August 9th, her medicine was changed from Tylenol to ibuprofen after imploring with the doctors that they do something. The symptoms only got worse. That night, when I took her to the bathroom I saw blood in her underwear. Her vagina was bleeding. I asked her if somebody had touched her or if she had injured herself but she said no. I took her to the clinic immediately.

18. At the clinic, I was told that there was nobody qualified in the clinic at the moment to inspect what was happening. I was told to come back. I felt so impotent that there was no adequate care to do something for my daughter.

19. The next day, I went back to the clinic and saw the doctor who told me that the bleeding was due to hormonal changes. My daughter is six years old and has never bled from her vagina. I did not feel that this was right and wanted answers.

20. I took my daughter back to the room and she only kept getting worse. Her fever was so intensely high that night that I took her to the clinic again. Again, I was told that the ibuprofen would help. She had now had a fever for close to two weeks.

21. On Wednesday, August 10th, she was looking and feeling the worst I have ever seen her. I went to an appointment with the CARA attorneys and within minutes of starting my consultation, [REDACTED] started coughing uncontrollably and vomited. Her fever was still high and she fell asleep immediately. I panicked.

22. My representatives called an ICE officer to come in right away. They checked my daughter and asked me if I had been giving her water. They called medical personnel and brought my daughter and I to the clinic.

23. I was reprimanded by ICE for letting my attorney know about what was taking place. I tried explaining what had happened and he denied that the 'hielera' and the 'perrera' exist. He told me that this was America and that people here are treated humanely.

24. My daughter is doing a little bit better now. She's been given amoxicillin and a dentist has checked her. Her fever is still there but she has energy and is able to go school. This entire experience has been a nightmare and it is outrageous that emergencies, especially around children's health, are treated with such calm.

Date: August 11, 2016

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

CERTIFICATION

I, Oriana Sanchez, certify under penalty of perjury that I am fluent in the English and Spanish languages and that I read the attached document to the affiant in Spanish who verified that its contents are true and accurate.



ORIANA C. SANCHEZ

08/11/2016

Date

Statement of [REDACTED]

1. My name is [REDACTED] (A# [REDACTED]). I am detained at the Karnes detention center with my daughter, [REDACTED] (A# [REDACTED]). [REDACTED] is [REDACTED] years old. We have been detained at Karnes since March [REDACTED] 2016.
2. My daughter and I shared a room with [REDACTED] and her daughter. She began to joke with us and call my daughter "her love." She told us that she liked to drink and that she liked men and women. She began to tell us things that she did with women. [REDACTED] started touching my daughter on her shoulder and back, playing with her. Or at least at that time, I thought it was a joke.
3. [REDACTED] asked me if I would sleep with her. I said if I didn't sleep in a bed with my daughter, why would I sleep with her? She just laughed. [REDACTED] also would lift up her shirt in front of my daughter. My daughter and I were very scared after this. It was hard for us to sleep.
4. I told a male GEO employee that I wanted to move to another room because [REDACTED] liked women. He asked if [REDACTED] had done something to me and I said no. So he said to wait because otherwise there wouldn't be anything left for him. My daughter was with me and this response was really ugly (lit. "feo").
5. On Wednesday, April [REDACTED], we were all in our room. [REDACTED] said she had to go to the bathroom. While [REDACTED] was in the bathroom, [REDACTED] opened the bathroom door. [REDACTED] was naked. When [REDACTED] opened the door, [REDACTED] got scared and shut the door. [REDACTED] opened the door again two times. After, [REDACTED] came back into the room, [REDACTED] said vulgarly that my daughter's body had changed and that she had pubic hair. My daughter felt very ashamed.
6. On Saturday, April [REDACTED], we were all on the patio. I had bought some shampoo for my daughter and [REDACTED] went to shower. Shortly after, [REDACTED] said she was going to go to our room. I went into the room a few minutes later. [REDACTED] had again opened the bathroom door, but my daughter had put her clothes on quickly because she was afraid. My daughter told me what had happened. I told [REDACTED] not to open the door again when [REDACTED] was showering. She just smiled.
7. The next day, Sunday April [REDACTED] after the last check-in at 8 PM, we were returning to our room when I saw [REDACTED] grab my daughter's private parts as [REDACTED] was going up the stairs to our room. I asked [REDACTED] why she was doing this but she just smiled. I went directly to report this to an official and we were moved to another room.
8. Last Tuesday, April [REDACTED], two female officials interviewed my daughter and I and asked a lot of questions. They said we shouldn't tell anyone what happened. I had never seen them here before. I think they were not from Karnes.

9. The next day, Wednesday April [REDACTED], a man and woman interviewed my daughter in the medical unit. They interviewed without me. I don't know who they were.

10. On Thursday, April [REDACTED], my daughter and I were interviewed again. We were interviewed by a man who works in the medical unit. He interviewed [REDACTED] first, then me. After asking about what had happened, he asked my daughter many questions about her father. They asked if he worked in El Salvador, how we got the money to come to the U.S. So I wonder if he was a psychologist, why he had so many questions. He also told us that what we had happened to my daughter wasn't going to help us to get out of Karnes.

I hereby certify that the foregoing statements are true and correct under penalty of perjury.

[REDACTED]

Date

[REDACTED]

I hereby certify that I am fluent in English and Spanish and that I translated the foregoing document to the affiant before she signed it.

[REDACTED]

Date

[REDACTED]

Declaration of [REDACTED] (A [REDACTED])

I swear under penalty of perjury that the following statements are true and accurate to the best of my knowledge.

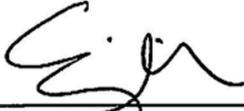
1. My name is [REDACTED]. I was born in Honduras on [REDACTED]. I have one daughter, [REDACTED]. She was born on [REDACTED] and is 2 years old.
2. I was detained at Karnes County Residential Center on or around April 27, 2016. I was transferred to the South Texas Family Residential Center on or around May 8, 2016.
3. On the first day of orientation at Karnes, the staff told me that I had to leave my daughter at the day care. [REDACTED] was crying when I dropped her off because she did not like being separated from me, but I had no choice. When I returned 30 minutes later to pick her up, [REDACTED] was still crying, harder than before. She told me that the woman in charge of day care had forcefully pinched and twisted her left nipple, and that the woman had pushed her to the ground. [REDACTED] told me that she did not want to go back to the day care center.
4. On the second day of orientation, we were brought in to watch a video. I tried to leave [REDACTED] with another woman who worked in the day care who seemed kinder, but that woman told me that I had to bring [REDACTED] back to the first woman, the same woman who had abused my child the day before. I reluctantly left [REDACTED] there and went to watch the video. When I came back about 30 minutes later, [REDACTED] was crying again. She said that the same abusive woman had pushed her down onto a mattress.
5. I did not bring [REDACTED] back to the day care.
6. I did not file a complaint at Karnes because I was afraid they would retaliate against my daughter and myself.
7. The employees at Karnes are clearly incapable of running a safe day care center for children. They have abused my daughter on more than one occasion, and I have personal knowledge that they abused at least two other young children. The Karnes staff has demonstrated that they are abusive towards children and not equipped to care for children in any way. .

[REDACTED]
[REDACTED]

Date: May 10, 2016

CERTIFICATION.

I certify that I am proficient in the English and Spanish languages and that foregoing was read to
[REDACTED] in Spanish.



Eunice Hong

5/10/2014
Date

Declaration of [REDACTED]

I, [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. My name is [REDACTED] (A [REDACTED]) and I was born in [REDACTED], [REDACTED], Guatemala on 9/2/1990. I have been detained in The Karnes County Detention Center since May [REDACTED], 2016 with my daughter, [REDACTED] born [REDACTED]
2. This morning I was called to the visitation area for an appointment with the attorneys. I took my daughter with me to the visitation area. The male GEO officer who was at the door to visitation told me that I couldn't bring my daughter in, and told me to take her to the daycare.
3. I took [REDACTED] to the daycare, and the woman there told me that I couldn't take my daughter to daycare. She said she didn't have it reported that I had an interview, so she couldn't accept [REDACTED] until 12:30. There were about 4 children in the daycare and about five GEO employees working. The GEO woman there told me to go back to visitation and that if they wouldn't let me have my daughter there, that I could go back to the daycare.
4. I came back to the visitation area and told the GEO officer at the door that they wouldn't take my daughter at the daycare, and he said that it was fine for me to bring her to visitation.
5. I met with the attorney in visitation, and my daughter was playing with toys in the corner of the room. It was time to leave and she was playing and did not want to leave. She was crying and struggling, resisting me trying to get her to leave. The GEO employee Ms. [REDACTED], told me to pick up my child. She said the child should not boss me and she ordered me to pick her up and to take her out by force because the child was crying.
6. I was upset because I was trying to get [REDACTED] to leave and was trying to talk her into calming down and leaving with me. I did not want to pick her up by force like Ms. [REDACTED] was telling me to do.
7. I was embarrassed because in my country we do not treat people like that in front of other people.
8. Right after I left the visitation area, I had my interview with the asylum officer. I prayed to God that I wouldn't get confused in the interview after the preparation I had just had. I think that I would have felt better going into the interview if that incident had not happened in visitation right before.

9. In the nursery they don't receive you cordially, rather they ask you why you are not taking the child with you. I thought it was a place to care for the children.

I, [REDACTED], swear under penalties of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read to me in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

Signed

[REDACTED]

Date

[REDACTED]

I, [REDACTED], swear under penalties of perjury that I am fluent in the English and Spanish Languages and that I read the above declaration to [REDACTED] in Spanish, a language in which she is fluent.

[REDACTED]

Signed

[REDACTED]

Date

Kristina Shull, Ph.D.
DOB 12/13/1980
Country of Origin: United States

Re:

Andis Vorfi (spouse of Kristina Shull at time of detention)
Age at time of detention: 37
Country of Origin: Albania
Gender identity: male
Name of Facility: Elizabeth Detention Center (CCA)
Dates individual was detained: 5/10/07 – 08/1/07
Topics covered in complaint: Hygiene, visitor access, medical, recreation, and legal access

I swear under penalty of perjury that the following statements are true and accurate to the best of my knowledge.

I write this testimony as both a U.S. citizen who has been negatively affected by the privatization of immigrant detention through the detention and deportation of my spouse, Andis Vorfi, in 2007, and also as a Ph.D.-holding historian with expertise in U.S. immigration and detention policy.

In May of 2007, my husband Andis Vorfi was arrested by ICE and detained at the Corrections Corporation of America-run Elizabeth Detention Center in Elizabeth, New Jersey. In compliance with an order of removal issued after his appeal for political asylum was denied, Andis was detained from May 10, 2007 to August 1, 2007 before being deported to Albania. I visited Andis almost every day in detention during this three-month period.

As I visited and spoke on the phone with Andis daily, he told me of his witnessing and experiencing these conditions:

- Used clothing, including underwear and undershirts with holes in them, to wear
- Used toothbrushes, grooming appliances, rusty razors, and expired toothpaste given to the men to use
- Limited bedding and thin/small blankets in a cold, air-conditioned environment
- Men sleeping on the floor
- Toilets with no stalls, meals served, and 40 beds all in the same room with no privacy
- Little to no access to the “law library” that contained books that were two to three decades old
- Spoiled food and food served beyond printed expiration dates
- Requests for medical assistance facing long delays, or no response
- Andis’s eye infection treated only with aspirin
- Other detainees’ medical conditions treated only with aspirin or sedatives
- No outdoor recreation
- High prices for commissary items

- High prices for phone cards

In addition to these conditions faced by men in detention, I experienced the following as a family member and visitor:

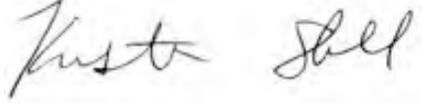
- Long waiting times, sometimes 2-3 hours
- Arbitrary and uneven enforcement of dress codes (for example, I was denied visits on multiple occasions due to an article of clothing I was wearing, a long skirt, that I was told did not meet standards, but in fact it did)
- No accountability or transparency: ICE officers referring me to CCA employees for inquiries or complaints, and CCA employees referring me to ICE officers for inquiries or complaints.

It became clear to me that the for-profit nature of the Elizabeth Detention Center presents a conflict of interest in the government's responsibility to uphold standard conditions of care for immigrant detainees, resulting in grave human rights violations in the expired and unsafe food and products served, gross medical neglect, and overall worsened, crowded conditions. In addition, private contract facilities are especially opaque and continue to operate with limited accountability.

In addition to my personal experience with for-profit immigrant detention, I also teach and conduct research in the history of immigration policy and detention in the United States. I am currently a Lecturer in History at the University of California, Irvine, and my doctoral dissertation, *"Nobody Wants These People": Reagan's Immigration Crisis and America's First Private Prisons*, analyzes the factors that led to the adoption of prison contracting in the 1980s under the Reagan Administration. The first federal private prison contracts were granted to the INS in 1983, part of a set of new detention policies established by the Reagan Administration that make up today's current system.

I have found that private prisons were not adopted out of careful consideration or in response to informed, extended research, nor were they rooted in fiscal sense, but were instead a politically expedient alternative opted for as a temporary solution during a time of prison overcrowding, misguided public fears of rising crime rates and anti-immigrant sentiment, and Cold War foreign policy commitments that mandated extended time in detention for certain migrant groups (such as Mariel Cubans, Haitians, and Salvadorans). As early as 1983, the General Accounting Office found extended immigrant detention to be both inhumane and too costly (General Accounting Office, "Detention Policies Affecting Haitian Nationals," Washington, D.C., General Accounting Office, June 16, 1983, iv.), and recommended that alternatives to detention be found. However, the use of private contracting has continued despite a long record of abuse, unrest, and human rights violations in these facilities.

In conclusion, private contracting is especially harmful in the realm of immigrant detention due to the current lack of codification of detention standards, and lack of access to legal counsel and family networks of support that immigrant detainees face.

 Kristina Shull, Ph.D.	9/30/2016
SIGNATURE	DATE

NAME:	Petra Albrecht
AGE AT TIME OF DETENTION:	52, 53
COUNTRY OF ORIGIN:	Germany
GENDER IDENTITY:	Female
NAME OF FACILITY:	Otay Det. Facility- CCA / Adelanto Det. Facility- Geo Group
DATES INDIVIDUAL WAS DETAINED AT FACILITY:	9-12-2014 to 9-4-2015 / 9-5-2015 to 1-12-2016 (Approx.)
TOPICS COVERED IN COMPLAINT (MEDICAL, DUE PROCESS, SAFETY, ETC.):	Medical Neglect, Due Process, Safety (cruel and unusual punishment), mis-classification (unwarranted lockdowns)

I swear under penalty of perjury that the following statements are true and accurate to the best of my knowledge.

Dear Governor Brown,

My mother in-law, Petra Albrecht, and my wife, Nicole Albrecht (placed in different facilities) were victims of egregious actions, misconduct, constitutional and regulatory violations, not only by ICE, but by the private facilities who housed them. After dealing with these private facilities first hand, it's clear they have no oversight, they are not held accountable for violations, and their main goal is to fill bed space, which equals billions of dollars each year for these types of facilities throughout the U.S. at the expense and suffering of immigration detainees.

CCA facility touted for it's "superior health care", medically neglected Petra Albrecht for approximately one year, as her health declined to a near fatal level many times during her 16 ½ months detained. Petra suffered excessive pain daily, and acquired the following serious health issues as a result of CCA medical neglect- accelerated heart rate (heart attack) - 3 ER visits- 2- Otay / 1 Adelanto, fluid on her heart, high blood pressure, three herniated discs, ovarian cysts, kidney stones, gastrointestinal perforation from pain killers- using 3-5 rolls of toilet paper daily, and defecating in the shower, and also malnourishment. This medical neglect was the catalyst for other detainees to submit official complaints, asking the facility and ICE to release Petra before she might become a fatality, which were ignored.

Petra was also forced to endure 20-22 hour bus rides to and from court (100 miles away in LA) in excruciating pain with three herniated discs (no treatment for 16 ½ months), arriving at court in a wheel chair, or using a cane or walker. The facility ignored attorney and family pleas of this cruel and unusual punishment.

Petra was also constantly prevented by the facility to properly communicate, and only provided a translator for her on a few occasions, making it impossible to lodge complaints, since they would return her complaints back to her, stating "they need to be in English". These actions basically cut her off from the rest of the world, and as a result, contributed to denying her due process, as she was first unaware, then not allowed to attend Dependency court hearings against her, and her 11 year old son, who as a result, was illegally extradited out of the United States back to Germany (refoulement), violating the 1967 United Nations Protocol Relating to the Status of Refugees, (child denied right to adjudicate pending asylum applications), also violating the Doctrine of Federal Preemption- straight from the Supremacy Clause in the U.S. Constitution.

Both facilities misclassified Petra over and over, who has no convictions, placing her in high level modules with dangerous, violent offenders who have convictions, which constantly placed her life in danger. The facilities also used her inability to communicate as a means of unnecessary, cruel lockdowns for days at a time, as Petra was helpless to stop the violations. All of these actions caused intentional infliction of emotional distress, and contributed to her steadily declining health.

Petra was also retaliated against for trying to contact the media for an interview regarding the deplorable treatment and conditions at Otay, San Diego, but was denied the right, then suddenly transferred to another facility, Adelanto.

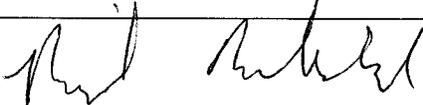
At Adelanto detention facility on 9/10/2015 , Petra suffered symptoms rendering her unconscious, suffering what she believed to be a heart attack, yet the facility only checked her blood pressure, and refused to take her to the ER, Ignoring pleas from Petra, her attorney, and family. Advocacy group, CIVIC / End Isolation also filed an emergency complaint with the facility and ICE, only to receive a form letter weeks later.

These are just some of the egregious violations which occurred to Petra while detained in these private detention facilities (detention for profit). As a U.S. citizen, I was shocked and unaware at the deplorable treatment immigration detainees faced, and more outraged that women are being treated this way, and it's inexcusable that tax payors are fitting the bill for these horrific acts against all immigration detainees, but especially that these private companies are simply profiting from the misery of others.

Private facilities such as these, or prison facilities should not be allowed to contract with ICE, and I support stopping this immediately.

Thank you,

Richard Wheeler

	9/22/16
SIGNATURE	DATE

CERTIFICATION OF TRANSLATION

I, **[name of translator]**, certify that I am proficient in the English and Spanish languages and that the foregoing was read to **[declarant]** in Spanish.

SIGNATURE OF TRANSLATOR	DATE

NAME:	Daria Voronina
AGE AT TIME OF DETENTION:	32
COUNTRY OF ORIGIN:	Russia
GENDER IDENTITY:	Female
NAME OF FACILITY:	Adelanto Detention Facility
DATES INDIVIDUAL WAS DETAINED AT FACILITY:	10/21/15 – 09/14/16
TOPICS COVERED IN COMPLAINT (MEDICAL, DUE PROCESS, SAFETY, ETC.):	Medical, food, hygiene, safety, recreation, mistreatment by guards, solitary confinement, due process

I swear under penalty of perjury that the following statements are true and accurate to the best of my knowledge.

[Below are excerpts from letters sent by Daria Voronina to Community Initiatives for Visiting Immigrants in Confinement (CIVIC), transcribed by Kristina Shull]

*7/20/16

My name is Daria. I'm girl from Russia. I'm detainee in Adelanto Detention facility 9 month. I came in USA 21 Oct 2015 and apply for the asylum. I want to announce my experience in Adelanto D.F... I hope journalists in media group can help me announce it, and I want to share my story with peoples who is fighting for the human rights in USA and why is not indifferent. Sorry for my bad English, I'm science educated girl, but I was learning my English here, 9 month in jail, my self. I'm Jewish girl and I like people and I like helping people also. I want to tell you some things about Adelanto... It is very worse place, where is I ever been in my life. I receive here in facility mental and physical abuse and torture...

I'm not agree with judge, but also I can't endure anymore... I don't know what I need to do... My health from bad to worse...

They give me a grievance form—it's complain form, but not give me pensils. I was can't fill grievance form.

[In solitary confinement] without blankets, toilet paper, woman pads, shower with soap, dental kit, they ignore me totally... I'm not alone in this problem.

GEO Group practice it, system for the torture people. GEO it's private big business, nobody can observe them, every thing locked, hided.

*8/22/16

I was in medical unit 2 weeks ago and I watched how couple of nurses locked on Asian girl in medical insulator, girl was cried she asked many time about explanation why they put her in

isolation insulator... I told the nurses, they are supposed to give the girl paper, about why she was locked up...

They humiliate me many times, insult, yelling in my face, like I'm deaf, pressing me sign them papers (I was told them many times about that, I have legal rights, not sign any paper). Officers from facility unprofessional... one officer told me, she was delivery pizza 2 weeks ago, and she came in Geo, she had a training for 2 hours and now she is big, important officer here! It's ridiculous but it's fact...

I 10 month here, from 21 Oct 2015, and I receive enough harm, mistreatment, mental and physical abuse. [wore a bandage on arm for 2 weeks after assault by guard for refusing to return to a lice-infected dorm, put in segregation. She asked the officer]: "Why you torture me? It's not your duty." It was obvious, she had adrenalin in her blood, her eyes was alight. I told her I professional psychologist, and I understud what's happen and she was not ok. I start told her about my plan. I wanna announce it anyway, about what she did with tell me tell DHS and ICE. She start threatening me, "It's very bad for my case." I was in insolation for 72 hours and I took hunger strike.

This all system make money on us. It's big business... I paid \$3200 for the rice, noodles, and phone calls...

Why I need suffering here? Because I search help from the US government...? Why I need to be in jail? I didn't do anything wrong. I never was convicted, I pass interview, I have a credible fear, I have my cousin my sponsor in America who want to support me outside, also I have money in my bank account, also I have 3 master degree from different university, I can work. Why I need sitting in jail? Geo-ICE keeping detainees here more 5 years!!!... We have no one actual book or magazine here, all the books 1980 years issued. All my life I studyed every my day, but here 10 month I already in degradation process, because of that...

Geo just make business well, we, all of us, meat for them, earning quick money. I agree with Hillary Clinton all facility like Geo supposed to be closed.

*8/26/16

U.S. Senator Dianne Feinstein now in facility. We (all detainees) was see her at 12 today, Friday, August 26th. We had a hope speak with her, but nothing happen. She was in dorm here in facility, around assistants from Warden. They are dancing around her with prepared show, it was ridiculous... They told her prepared fake show. We detainees was watched her and want to speak, but we didn't have a chance... I want to send this letter for you. You can send for her or you can publish it. We everybody agree. Please make it for us... Americans and government need to know what's go in on in real life not just on the papers and prepared show. We too much suffering here, us need a help. Big thank you.

Adelanto detainees, 8/26/16

Claims for GEO.

- 1) Facility Adelanto (Geo) don't follow shedule for the backyard (detainees no receive fresh air sometimes 3-5 days).
- 2) Geo give for detainees trash, no possible eat food (example 8/14/16 gave for us expired pizza on the boxes was date 7/29/16, also regular good GMF (genetic modification). Facility no have special diet, they are write special diet, but it's the same food, which regular detainee receive.
- 3) Geo give for detainees old, used from another detainees underwear (top and bottom), old uniform.
- 4) Officers in Geo unprofessional, treating us like prisoners, inhumiliate, insult, pressing, yelling on the face, without reason, threat put in insolation, make bad for the case, they rude, agressive dominant with us.
- 5) Facility no have actual literatures, no magazines, no new book, all book old 1980 years issue. (It's make degradation process). No internet.
- 6) Facility no provide fitness, or yoga classes, no have exercise, no English classes. We can't reduce stress, body weak.
- 7) Bad, very limited medical help.
- 8) Facility have a bad quality water, which damaged skin and hair.
- 9) Facility make mix new and old time arrived detained (which make hight risk catch illness and make epidemic). It was 2 time. One epidemic was lice insects, another time all unit catch influenza. Medical just gave me 10 single serv bags iodized salt. Tuberculosis also problem here.
- 10) Geo hinder make job for the court.
- 11) A grievanse form doesn't work.
- 12) Geo make punish us, they can lock in insolation without reason, usually reason for them, investigation process, which go on 72 hours lock. And then they didn't found nothing.
- 13) Double price detainees pay in commissary.
- 14) Iron bed, no have pillows, old, bad mattresses.
- 15) Geo no allowed use personal staff (also after medical necessity permission)
- 16) For the one conversation on the phone detainee pay 5-7\$ (expensive).
- 17) Unit no have privacy, all restrooms opened.
- 18) 120 people in one room, it's make too much noise. We have no sleeping or relax rooms.

Generosity, kindness and respect should be treated every human being!

*8/29/16

I have a bad news. Today a grievance woman came to me in dorm, she gave me a grievance form from 8/24/16 and she gave me her response about it. Facility start treating me smart and official... very rude, aggressive and dominant with me. When I came to her, ask about backyard, because already 5 days, Geo didn't open backyard for us.

A grievance woman she is working for the Geo, and all the time she is defending Geo or also now I understood she hide a grievance forms and usually she response oral arguments, not in the paper... she wrote me she spoke with witnesses, who is her witnesses? It was in dorm full of detainees which was all witnesses and they was in indignation about how officer was action with me, also 2 detainees came to me and told me, they also had a problems with the same officer.

One of them told me on the breakfast, officer M. gave her rotten orange and detainee ask her about she don't want to eat rotten orange, and officer M. with yelling on her refuse change orange, that reason for Geo was put her in insolation for the 12 hours because Officer M. was lies in her report... and in the end Geo just defended officers, never hearing detainees, they put her in segregation for the nothing.

I ask the girls, "are you wrote a grievance about it?" They are told me, "not" they don't want to be against Geo because Geo already told them it's will be bad for them cases and they fear Geo. All that system go on the circle, everybody happy but not the detainees... suffering in jail, peoples around earning big money for the us bodyes and told me I can't defend myself... Geo pretending to be angel and it's will be hard, tough prove inverse.

*[Full letters from 7/20/16, 8/22/16, 8/26/16, and 8/29/16 attached here]

These excerpts transcribed by Kristina Shull

A handwritten signature in cursive script that reads "Kristina Shull". The ink is dark and the handwriting is fluid and connected.

9/30/16

①

Hello.

My name is DARIA. I'm girl from Russia. I'm detainee in Adelanto Detention facility 9 month. I'm came in USA 21 oct. 2015 and apply for the asylum.

I want to announce my experience in Adelanto D.F. I'm already in contact with NBC channel, I hope journalists and media group can help me announce it, and I want to share my story with peoples who is fighting for the human rights in USA and who is NOT indifferent.

SORRY for my bad english, I'm science educated girl, but i was learning my English, here, 9 month in jail, my self. I'm jewish girl and i like people and i like helping people also. You address gave me one nice girl from Cameroon. I want to tell you some things about Adelanto detention facility. It is very worse place, where is i ever been in my life.

I receive here in facility mental and physical abuse and torture.

I came back in facility Adelanto after yesterday 07/18/16 after one week in hospital. In hospital API doctor was fixed me in deep depression and now i take a medication pills. They hospitalize me after incident with lieutenant from facility. Facility had a lice insects epidemic in ESD unit. 3 my neighbours already was infected. I requaed multiple time change my bunk urgently, because i was in anxiety and apprehension about my health, because medical fixed, one more my neighbour caught lice insects, 7up, I was 7 Low. ~~The~~ Medical personal (staff) told me i was lucky, because i not catch insects. It's was big reason for me, no moved back in my bunk and urgently change it. Officer and lieutenant refuse. with commented: "I not take care". For the while another lieutenant tortured me by hard handcuff (I was explode in tears and told she i have a pain, but she came to me and make more compress my hand). she threatened me throw me in insulator and threatened me spill ^{paper} spray in my face

(2)

and make bad for my case, REASON was, I refuse go back in my bunk in infected area and jeopardize my health.

Officers in detention Adelanto Not Professional, they are don't know elementary security of lifeactions. They exceed official authority, can ignore detainee, they are also ignore medical instructions (I'm allergic, they are 9 month give me food what i can't eat) also food look like trash food, they inflict morale, mental damage, they are pressure, pressing detainee, they are disrespect, insolence with detainee. Every time took position Aggressive Dominant. After incident with infected detainees, lieutenant throw me in insulation for the 72 hours (they are have a legal right put me in insulation if i was danger for the another detainee, but i didn't).

I just refuse go back in infected area and jeopardize my health. When i expressed my opinion about i want to call to hotline in Washington and state about torture, threats and mental abuse in DHS and ICE. After that she start apologize and told me SORRY, how she understand me and she thinking i probably was very upset and she want be nice with me.

I told her, with me it's not working like that and ofcourse i called in HOTLINE ICE and DHS. Authority was tooked, fixed incident and woman online told me need 10 days for the investigation. Now already 3 weeks gone OR MORE after incident and i don't know nothing about investigation.

When I was in insulation 72hours, my Deportation officer Caban, he came to me and he told me, he want to release me and i gave him phone my cousin. He called my cousin and told she, which documents him need for the my release.

She submitted documents like my sponsor and support side, he received documents and 07/07/16 he sent for upper, for the boss. 07/11/16 My political asylum was denied by judge Jeremy Palomino, who is judge just 11 month.

3

I'm not agree with Judge, but also i can't endure anymore, I'm already 9 month in custody. I don't know what i need to do My health from bad to worse. I can make appeal his decision in federal court, but it's will be long time process. . . . my attorney told me it's will can be like 6 month OR MORE OR 1 year. . . . I not completely understand why they are keeping me here. I not have criminal record in any country, also in USA, I have a support side (my cousin) she is my sponsor and i have credible fear. I have all legal right go out from custody, but they keep me here. And now my case was denied. If i will take, sign deport, it's will be (practically) 2,5 month, or if i will make appeal process, I also not sure, they are will release me or will be keep me here for 1 year more ^{or} I need a help now with my decision and with announce my story in media and newspapers.

Also my story with in declaration for asylum, was published in NYtimes, You can search in internet it.

"Russian Legislator's body is found in a barrel filled with concrete". Mikhail Rakhomov, I have a 15 evidence about it, my man was killed in my home country and i receive too much harm and i was suffered and i fled in USA and apply for the political asylum.

I'm sure Judge was not competent in Russian politics, and my case was, may be first Russian case for him and my case really heavy and difficult. He was denied my case by Reason - credibility. Credibility very difficult make appeal.

I'm really don't know what i can do with it, I think if i will announce my experience in Adelanto for the mass, multitude i have a chance go out and appeal my case outside, but i'm not sure. . . . I really need a advise from somebody.

④

Also when I was came back in facility from API hospital, facility staff continue torture me here.

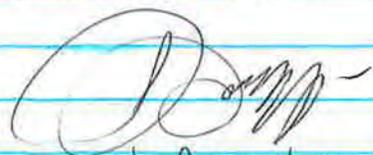
In the same evening, when I came in, they throw me in insulator without reason, I was asked about paper what's reason, why I'm in insulation, they didn't give me any paper, nothing. They are tortured me 24 hours, they are didn't give me drink water, ignored me completely, when I knocked the door. They didn't give me phone for the inform my attorney and my relatives what's go in on. They was very rude with me, I feel punishment and torture. They give me a grievance form - it's complain form, but not give me pensils. I was can't fill grievance form. People who is working in Adelanto facility mental abuse me. More 2 hours I was in cold insulator without blankets, when officer came in she was given to me dirty shits. Also I was without tualet paper, woman pads, shower with soap. I didn't brush my tooth because I ~~was~~ didn't have dental kit (brush and paste) and they ignore me totally.

I thinking it's not normal for the America, people need to know it.

I'm not alone in ~~my~~ this problem. Also another detainee receive here the same abuse and torture. GEO group practice it, it system for the torture people. GEO it's private big buisness, nobody can observe them, every thing locked, hided. I need a help and I hope this letter you will receive..... Because already 9221# civil group and human rights group phone blocked in this facility.

VORONINA DARIYA ☺

with last hope.....



07/20/16

Also I have a information about last 9 month 3 people died here.

①
Hello Tina!

I received your letter, thank you for that. I gave for another peoples you address, because i'm not alone with that problems, i was in medical unit 2 weeks ago and i watched how couple^{of} nurses locked one asian girl in medical insulator, girl was cried she asked many time about explanation why they put her in ^{isolation} insulator, i watched how one fat, disgusting nurse was ^{looked on her, and} laughing at girl who was crying to much. I was sorry for that. I told the nurses, they ^{are} supposed to give the girl paper, about why she was locked up, because she have a right know that. For a while officer ran in and took us (all witnesses) back in dorm unit, i will try search that girl and give to her your address. May be, if your group can have more letters and evidence, may be will possible make difference.

One nice woman visited me in this weekend, thanks for that, she told me 200 peoples was on protest action and last week judge was cancel contracts between government and all own facility, but not with GEO. It is very good result! Your group make good things, ^{GEO need close too} because GEO it very worse place when i ever been. This place eventually not for the decent, innocent people. GEO officers actions with detainees like prisoners, they humiliate me many times, insult, yelling in my face, like i'm deaf, pressing me sign them papars (i was told them many times about that, i have a legal rights, not sign any papars) Officers from facility unprofessional, GEO hire people from street, one officer told me, she was delivery pizza 2 weeks ago, and she came in GEO, she had a training 2 hours and now she is big, important officer here! it's Ridiculous but it's fact, I 10 month here, from 21 oct 2015, and i receive enought harm, mistreatment, mental

2.

and physical abuse, also i had a 2 assaulte incidents with sergeants, one incident was 15 march 2016, with Boware, which i didn't report for ICE and DHS, because i was scared them, second incident was 14 June 2016 with sergeant BRISENO, i Reported this incident on Hotline 1-888-351-4024 and 1-800-323-8603 DHS and ICE. In first incident Sgt. Boware inflict me physical damage, that i was fixed in medical unit and doctor Blanco dress in on my arm fixing bandage, which i carried 2 weeks. Second incident 14 June 2016, with sergeant BRISENO and lieutenant Castanon.

My diary notes: The same words i was reported:

I was receive threats from lieutenant.

Because i Refuse go back in infected area and jeopardize my health. Facility have Lice insects epidemic. 3 my neighbours already was infected. I requaed multiple time change my bunk urgently, because i don't want to be in infected area and catch a illness. Lieutenant Castanon told me:

"She not take care" also the same words repeated me officer Breen.K who had responsibility for the E1D unit, and Castanon told me i need will write KITE form, which mean 7 days, but practically 3 month for the response about change bunk. Castanon express me her neglect and dominant, arrogance and she threats me put me in insolation. I was in medical when 2 lieutenant come in BRISENO and Castanon. BRISENO told me, she wanna put me in insolation. I was asking about objective reason for that, she told me, she have a report from officer Breen.K, allegedly I'm hinder officer make her job and allegedly I disrespected with officer. I told her, I didn't disRespectfull with anybody and I requaed officer Breen.K and lieutenant Castanon urgently change my bunk, because I was in anxiety and apprehension about my health.

3.

Because medical personals fixed one more my neighbour caught lies insects, 7up, I was 7LOW. It's was big REASON change my bunk, but lieutenant and officer Refuse.

After that in presense witness (was NURSE Lydia Jodaln) lieutenant BRISENO handcuffed me hard, I was explode in tears and told she: "I have a pain, stop doing it, it's hard for me, she came to me and maked more strong, hard compress, my ARMS immediattelly was red and after 4-5 min blue colour. She escorted me in segregation insulator. She throw me in insulator with threat - she will spill paper spray on my face and loud slamed the door. She came in back after 20 minutes and told me i need to go with her. When she escorted me in INTAKE i told her: "Why you tourture me? Are you like tourtured people?" "You woman, maybe you already mam, why you doing with me like that, stop, you can't tourture me, it's not you duty", you need understand that.

It's was obviouse, she had adrenalin in her blood, her eyes was a light. I told her I professional psychologist, and I understud what's happen and she was not OK, I start told her about my plan, I wanna announce it anyway about what she did with me tell DHS and ICE. She start threatening me: "it's very bad for my case", I ask she, what bad for my case? "Nobody can't tourture me and threats me about my complains and it's will be bad for my case!"

I told her about my plan and i will make it anyway, i will announce. I repeated she tortured and threatened me.

She start told me sorry, how she understand me, probably she thinks i was very upset. I told her, it's not working with me like that. For the while aother officer handcuffed me because i was fear BRISENO i told her if she will continue tourture me i will take hangr STRIKE, because i didn't have any choise. Sgt. BRISENO decided continue tourture me and i was in insolation 72 hours and i took hangr STRIKE. I was reported about incident 15 June, because GEO

4.

didn't give me make phone call. After this report in Washington DC, my deportation officer Caban was running in insolation, he told me he was listening rec report and he want to call my cousin and speak with her, also he told me, i don't need to be against GEO, i gave him my dairy notes, which i was wrote in insolator.

Also in the same day when was incident, lieutenant Castanon and officer Breen K. forced me make clean facility, they also been inform about my medical condition. I have a diagnosis mortal swell (cheek Kvinke), hight risk allergy for many kind of food, chemistry, pollen, dust, wool. I have to make all my life clean blood (plasmaferes) every 6 month, ^{5-7 treatments} it's make low down allergens and i can live normally. My DO been inform about that too, and wrote me i need to ask medical about it.

Medical companies in GEO Adelanto was changed 2-or 3 time for the while 10 month and result Not satisfactory. Also the same hard limited medical preparations. For a example: i was catch influenza from new detainees which was came, i requested medical, when i came to medical they are just gave me 10 single serv Iodized Salt, and told me you will be ok 😊😊. In november 2015 in facility Adelanto died one detainee in west side, this is reason they was changed medical company. But quality (CCS correct care solutions) also very bad. Recently this company wrote on the Request form words: "I understand and agree that a clinic fee may be charged to my account for this visit" Patient Signature.

This all system make money on us. It's big buisness. GEO receive money from government 160\$ every detainee per day, we pay double praise in commisary, we pay for the phone calls TALTAN communications Debit .10/minute collect .15/minute International .15 minute International mobile .35/minute for the 10 month i payed 3200\$ for the Rice, noodles and ^{phone} calls.

every time i pray for the not catch TUBERCULOSIS from new detainees 3 month ago they brought in one girl with TUBERCULOSIS!

5.

GEO give for the detainees trash food, expired pizza was given for us 08/14/16, date on the pizza boxes was 07/29/16 and 08/06/16; when detainees see the expired dates they throw out pizza. Also GEO give for us old (used from another detainees) top and bottom underwear, old uniform, detainees no have privacy, all restrooms opened no have a doors, officers didn't follow shedule for the backyard, we didn't receive anought fresh air. Sometimes they didn't open the door 3-4-5 days, when we ask about REASON, officers Responised allegedly all officers to busy, what's obvious not truth.

Officers working here for price 14\$ per hour day and night time. They UN professional, very lazy, they don't want to stay outside without air conditioner. I lived 10 month in one unit with 120 people simultaneous, we 120 people have just 2 microvawe, every day i have to wait 4-6-8 hours for the cook my noodles or rice, every time it fightfull. 10 month i can't eat food from GEO, because im ^{can't eat trash food, also} allergic i need a special food. GEO every day give me tray (they call it special diet) but it the same food which every regular detainee received. 10 month ^{I didn't take food from GEO, just bananas and pine butter} i was eating here Rice, noodles and bananas (bananas i receive from GEO, it usually rotten) NO vitamins, No minerals - nothing.

Why i need suffering here? Because i search help from US government? Why i need to be in jail? I didn't do anything wrong. I never ^{was} convicted. I have a credible ^{i pass interview} fear, i have my cousin ^{my sponsor} in America who want to support me out side, also i have money in my bank account, also i have 3 master degree from different university, i can work, Why i need sitting in jail? GEO ^{ICE} Keeping detainees here more 5 years!!! This chart ICE(DHS) - GEO apparently corrupted.

6

We no have no one actual book or magazin here, all the books 1980 years issued. All my life i was studied every my day, but here 10 month i already in degradation process, because of that. Also i didn't take any exercise OR yoga classes OR english classes, because GEO didn't provide it. Yoga OR exercise, fitness classes necessity for the detainees Reduce stress, but nobody take care, GEO just make buisness well, we, all of us, meat for them, earning quickle money. I agree with Hillary Clinton all facility like GEO supposed to be closed. Because all the detainees suffering here from lack normal life. We not receive at all, what US government care of us. It all settle down in own pockets which usual-typical American pay every month.

If someone want to take interview i open for that.

I to much suffered here in facility Adelanto 10 month, i was sign deportation because i can't endure anymore.

I completely exhausted and destroyed from people who is working in GEO Adelanto.

My friend

Vanda

3103820980

She have a pics of my letter, which she was sent for the NBC channel and human rights group.

My case was denied 11 july, which contanted 15 evidence, Reason was crediability, judge Palomino who is 11 month judge, denied my case, and i Not ready make appeal.

I'm very, very up set, but Not hopeless.

I have a couple of options outside, i will try it in FRANCE territory.

facebook - Dania Boffin

Skype - danohka3

08/22/16

VORONINA DARIA

email - 89167135999@mail.ru

A * 208085372

my Russian cell phone will be work when i go out

removed

Hello Tina.

I wrote you my second letter, i hope you receive my first. Today one woman from group visited me and i told her, U.S Senator Dianne Feinstein now in facility. We (all detainees) was see her at 12am today, Friday, August 26th. We had a hope speak with her, but nothing happen. She was in dorm here in facility, aroud assistents from Warden, they are dancing around her with prepared show, it's was ridiculouse, They told about special diet, which didn't exist, just on the paparwork, they told her about TV which we can watch, they told her prepared fake show. We detainees was watched her and want to speak, but we didn't have a chance. I was spoke with detainees and we prepare for her letter, but also we didn't have a chance, give it.

I want to send this letter for you. You can send for her or you can publish it. We every body agree, Please make it for us. We tired be meats for the ear money from us bodyes. Americans and government need to know what's go in on in Real life not just on the papars and prepared show. We too much suffering here, us need a help. Big thank you,

Adelanto detainees.

08/26/16

Claims for GEO.

- ① Facility Adelanto (GEO) don't follow shedule for the backyard. (detainees no receive fresh air sometimes 3-5 days).
- ② GEO give for detainees trash, no possible eat food (example 08/14/16 gave for us expired pizza on the boxes was date 07/29/16, also regular food - GMF (genetic modification). facility no have special diet, they are write special diet, but it's the same food, which regular detainee receive.
- ③ GEO give for detainees old, used from another detainees underwear (top and bottom), old uniform.
- ④ Officers in GEO, un professional, treating us like prisoners, inhumilate, insult, pressing, yelling on the face, without reason, threat put in insolation, make bad for the case, they rude, aggressive dominant with us.
- ⑤ Facility no have actual literatures, no magazines, no new book, all book old 1980 years issue. (it's make degradation process). No internet.
- ⑥ Facility no provide fitness, or yoga clases, no have exercise, no english clases, we can't reduce stress, body weak.
- ⑦ bad, very limited medical help.
- ⑧ Facility have a bad quality water, which damaged skin and hair.

9) Facility make mix new and old time arrived detainees (which make high risk catch illness and make epidemic).

it was 2 time. One epidemic was Lice insects, another time all unit catch influenza.

Medical just gave me 10 single SERV bags Iodized salt.

Tuberculosis also problem here.

10) GEO hinder make job for the COURT.

11) A Grievance form doesn't work.

12) GEO make punish us, they can lock in insolation with out REASON, usually REASON for them, investigation process, which go on 72 hours lock.

And then they didn't found nothing.

13) double price detainees pay in commissary.

14) IRON bed, No have pillows, old, bad mattresses.

15) GEO no allowed use personal staff (also after medical necessity permission).

16) FOR the one conversation on the phone detainee pay 5-7\$ (expensive).

17) Unit No have privacy, all RESTROOMS opened.

18) 120 people in one ROOM, unit it's make too much noise. We no have sleeping OR Relax ROOMS

Generosity, kindness and respect should be treated every human being.

Hello Tino,

I have a bad news. Today a Grievance woman came to me in dorm, she gave me a Grievance form from 08/24/16 and she gave me her response about it. Facility start ~~threatening~~ me smart and official. 08/24/16 I was fill a Grievance form about: "Officer Madero was very rude, aggressive and dominant with me. When i came to her, ask about backyard, because already 5 days, GEO didn't open backyard for us. We have a time today from 2.p.m until 4 p.m. She yelling on me: "get away from me". i told her, she is rude, impudent and unprofessional." Response from GEO: August 25, 2016, Voronina Daria A*208085372 From: L. Woelke, Grievance Coordinator Grievance Form # 16-0256E.

This is in response to your grievance I received on 8/25/16; you state, the dorm officer was rude and aggressive and dominant with you when you came to her about the yard time not being opened. You quoted the officer said "get away from me" to you. I have investigated into your allegation and was told by several witnesses you were the person who yelled at the officer aggressively when you first approached her. All she said to you was "get away from me". This has been a pattern of your behavior.

It is important when you file a grievance with good faith. If you continue to file grievance with false information it could be considered abusing the grievance system and adverse action can be taken against you. Identifying you as having a Pattern of Abuse to the Grievance System, as it is stated in the Detention Standards PBNDS 2011

Grievances Page (399) Section E.

Tina, i believe i need a good lawyer for the advise me or make case against GEO. A grievance woman she is working for the GEO, and all the time she defending GEO or also now i understood she hide a grievance forms and usually she response oral ^{arguments,} not in the paper, because i believe all the forms reading and monitoring ICE and DHS. When she response oral arguments, it's didn't make any difference, but i was tell her, i want her write me, and now i can see it's, make for them completely different, they wrote me i provide false information!, which not true!, also she wrote me she spoke with witnesses, who is her witnesses was? It's was in dorm full of detainees which was all witnesses and they was indignation about how officer was action with me, also 2 detainees came to me and told me, they also had a problems with the same officer, one of them told me on the breakfast, officer Mamolejo gave her rotten orange and detainee ask her about she don't want to eat rotten orange, she need to give her fresh orange, and officer Mamolejo with yelling on her refuse change orange, that reason for GEO was put in insolation for the 12 hours because officer Mamolejo was lies in her report, allegedly detainee ^{throw} put on her rotten orange, what's was lies, when i spoke with detainees about incident with my neighbour she was 47, i was 412, all detainees told me officer was very rude with 47, 47 put back in box, that rotten orange, not on officer.

3

but ^{also} 47 was argued with officer about her rudness, and ^{in the end} GEO just defended officers, never hearing detainees, they put her in segregation for the nothing. Also 452 came in to me and told that officer too much like a liar, also she had incident with her. I ask the girls: "Are you wrote the a grievance, about it?" They are told me: "not" they didn't wrote. For my question "why?" they answered me they don't want to be against GEO because, GEO already told them it's will be bad for them cases and they fear GEO. All that system go on the circle, every body happy, but not the detainees, what ^{try} searching the help and just paying for the lawyer lawyers, paying for the Rice and noodles double prices in commissary, and suffering in jail, peoples around earning big money for the us bodies and told me i can't defend my self, because what's i will be told about GEO it's all the false, GEO pretending be angels, and it's will be hard, tough proof inverse.

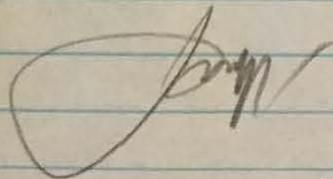
I very upset about it, and thinking may be some good lawyer want take out truth, which very carefully keeping GEO and threats every one with liars or make bad for the case and i believe they can.

✶✶

—

Veronika Daria

08/29/16.



Also ICE officer told me today deportation process maximum ~~it~~ can be 90 days. I already 1,5 month on. I hope i will be ~~po~~ deported soon.