

Declaration of M.P.O.

1. My name is M.P.O. I have been detained with my 8 year old son, S.G.L., for 425 days. We were brought to the South Texas Family Residential Center on October 6, 2019, and we have been here ever since; we have never left, not even for an appointment with a medical specialist outside.

My son has been symptomatic since November 22, 2020, but was only diagnosed with COVID-19 and quarantined on November 25, 2020, after four trips to the clinic.

2. On Sunday, November 22, 2020, S.G.L. and I fixed breakfast in the kitchen shared with our hallway, and showered. While showering, I noticed that S.G.L.'s body was red and hot. I told him he must be feverish, and he said no. I brought him to the park outside to play, but after just a couple of minutes he said he wanted to go back to his room. Another family we were friends with had just arrived, so we stayed out a little longer. Around 3:30 PM, we returned to our room, and I noticed that S.G.L.'s eyes were irritated and he seemed strangely sleepy. I felt his forehead and realized he had a fever. He also said that he had a headache, stomachache, and nausea.
3. I brought S.G.L. to the clinic that same day at 4 PM. The nurse who saw us asked why we came, and I explained that he had pain in his head, eyes, and stomach; nausea; and a fever. The nurse asked me very rudely how I knew that S.G.L. had a fever, and I replied that he's eight years old, I know by now when he's sick. He had pustules around his mouth and inside his lips, and the nurse told him to open his mouth so she could look inside. He didn't understand what she was asking, so the nurse took off her own mask and opened her mouth and stuck out her tongue to show him. S.G.L. copied her, and then she put her mask back on. I was shocked that she had taken off her own mask while S.G.L. was obviously sick; it seemed like she wasn't taking his condition seriously.
4. After that, S.G.L. and I waited for an hour and a half to see a doctor, who spoke to us with an interpreter. I explained S.G.L.'s symptoms again to the doctor, who called a nurse to do a vision test. At the end of the exam, the doctor said that S.G.L. was "fine," and asked me if I had any questions. I couldn't understand why the doctor would say he was fine when he obviously wasn't. The doctor said that S.G.L. was fine "on the outside," and that she "didn't know how he is on the inside." The doctor didn't give us any treatment, not even Vick's, for S.G.L.
5. The doctor sent us away, so I brought S.G.L. to the cafeteria to eat dinner. Afterwards, we went to the park again and he played with his friends some more. My friend brought her two year old daughter to the park to play too; we have been detained here together for over 400 days, so S.G.L. and her daughter are good friends as well. The little girl is so young that she often loses her mask without her mom ever realizing it; I think this happened again while she was playing at the park because she didn't have a mask on when she fell and started crying. S.G.L. saw her crying and ran over to her, picking her up to bring her to her mom. S.G.L.'s mask had slipped down to his chin while he was playing, and wasn't covering his mouth when he carried the little girl over.
6. Around 8 PM, I went to the pharmacy to ask about medication for S.G.L. The pharmacist told me she had none; when I protested, she told me to bring S.G.L. back to the clinic. We went back to the clinic around 8:20 PM on Sunday, and talked to a different nurse. She seemed worried about

S.G.L.'s fever; it was 100 degrees. She asked me why I hadn't brought him in earlier, and I told her that I had brought him earlier that day. She listened to S.G.L.'s lungs and gave me some serums to ease his fever. She sent us back to our rooms with instructions to return at 1:30 AM to take his next dose of the serum.

7. So we went back to our rooms and got up again at 1:30 AM. A guard from our hallway escorted us to the clinic at night. I spoke with yet another doctor, who asked why we were there. I explained that S.G.L. has a fever, headache, throat pain, eye soreness, and nausea. The doctor confirmed that he hadn't vomited, only felt like it. His fever was 101.6 degrees. Then the doctor gave S.G.L. another dose of the serum. He just left the room and never came back; he didn't give us any further instructions or advice. We waited there for him for a long time before I realized the consultation may have ended. I stepped out of the room and asked the official there waiting for us if we were done, and he said we were.
8. We woke up on Monday and went about our detained lives like normal. We went to the cafeteria for breakfast, and then I brought S.G.L. to the daycare because the facility has assigned me cleaning duties that I complete during the day. All the kids in daycare wear masks, but being kids, they don't always wear them well. In daycare, the kids play with toys, which are often used by multiple kids in the daycare. They also sit 2-4 kids per table to play board games, tablets, and watch TV. This particular day, even though S.G.L. and I were living in the yellow complex, I was sent to clean a hallway in the red complex that week.
9. After I finished my work shift, I went back to the daycare to pick up S.G.L. We went to the park, where he played with his friends; grabbed a snack in the kitchen, and went to the library too. In the library, I waited for about 15 minutes in a line with approximately 9 other families to use the computers. We stood side by side and talked with each other as we waited.
10. Later on Monday morning, the medical staff sent for me to do a COVID test on S.G.L. I imagine that the doctor from the night before had scheduled it, although he hadn't said anything to me at the time. The doctors only tested S.G.L. for COVID-19; not me. They administered three tests, including the COVID test, and sent us away with a dose of acetaminophen that S.G.L. could take every 6 hours.
11. Even after testing him for COVID, the medical staff did not quarantine or even isolate S.G.L. They sent us off and didn't even return to check on him for two days, until they got the results back.
12. Meanwhile, S.G.L. and I continued our daily routines on Tuesday. I left S.G.L. in daycare for a short time while I reported to work, but I was told there was no work. We went to the park and the library in addition to the kitchen, cafeteria, and shared bathrooms. He still had a fever and symptoms all day.
13. On Wednesday morning I left S.G.L. in the daycare and worked again in the red hallway. That morning, we also went to church. There were about nine other families in church. As a treat for Thanksgiving, the pastor had brought some books for the children to read; he left them all in a

box on the floor and S.G.L. knelt down around the box with about 5-6 other kids to dig through and pick out books.

14. Coming back to our rooms from church, a guard told us that some officers and medical staff were looking for me; he told us not to leave again. I asked why they were looking for me, and he said he didn't know, but that I shouldn't worry. So while I waited for those officers to come to the hallway and find me, I brought S.G.L. to the bathroom to shower. In the bathroom, S.G.L. greeted his friend, a three year old boy in another family that has been detained here with us for over a year. They played together in the bath.
15. Around midday on Wednesday, November 25, a nurse came to the hallway and told me to come to the clinic. I waited in the waiting room, until a doctor came out and told me that S.G.L. had tested positive for Coronavirus. She said to go back to our room and pack our things, that we were being moved to quarantine. We were escorted back to the room and waited until about 5 PM. I think we had to wait so long because they were moving other families who had been quarantined in the medical annex. Eventually, they brought us to a room in the medical annex, where we have been quarantined ever since.

We are being quarantined in the medical annex, which I fear is affecting S.G.L.'s ability to recover. It is freezing and he doesn't want to drink the tap water. I keep asking for medicine and no one will bring it to us.

16. The room they have us quarantined in is freezing. I put on two pairs of clothes, hoping to warm up, but never really have. The first night, huddled under two sets of sheets, I asked the guard in the hallway if they could turn on the heat in our room, but she told me that the room can't be hot because S.G.L. has coronavirus. I'm not sure what that means, but she did offer to bring a third set of sheets, which I accepted.
17. Even while I am freezing, and feeling like I was back in the *hielera*, S.G.L. is burning up with fever. He sleeps on top of the sheets because his body feels so hot. I kept asking the nurses and guards to bring him medication to lower his fever, but nobody did for days. I am afraid now that S.G.L. could get even sicker from being in this cold room.
18. S.G.L.'s symptoms have not improved. He still has a fever, full body aches, nausea, and fatigue. His lips blistered and then ruptured and bled from the fever. I want to cry every time I look at his cracked, bleeding lips.
19. On Friday, I started feeling badly too. I told the doctor that I had back pain, headache, stomachache, and a sore throat. The doctor said I may have COVID-19 too, and gave me the test. The test came back negative, but I know there have been many false negatives. Last night I woke up feeling like I couldn't breathe and like I wanted to vomit.
20. The worst pain I've felt was actually my migraines, as they have been acting up due to the stress of being quarantined with my sick son, and I have not had proper access to the medicine I would normally take. Even though I have asked the nurses and officers for Excedrin every day, I have only received pills for my migraines four times over the last seven days.

21. The doctor who checked us yesterday, November 29, said that S.G.L. needs to drink more water. I explained to the doctor that the only water we have access to is from the sink in the bathroom, and that S.G.L. refuses to drink it. I asked for bottled water or filtered water from somewhere else, but the doctor did not provide it.
22. Finally, on Sunday, a psychologist came to talk to S.G.L. and I begged her to help us get fever medication and bottled water for S.G.L. She came back about half an hour later with a couple doses of serum and two bottles of water. S.G.L. finished the two bottles of water within half an hour.
23. The room where we are being held is also quite dirty. It's very dusty; you can see it on the floor and swirling in the air when you turn on the lights, and we are breathing it in. There were also fabric pills and strands of hair all over the floor when we were brought here; I cleaned the floor with my hand and some toilet paper. The bathroom always smells like urine and feces, which contributes to our distaste at drinking the tap water. I tried to clean the bathroom with hand soap and the rag they gave us for showering, but it hasn't gotten rid of the smell. The bathroom is only separated from the room by a curtain, which is very dirty. It's stained and looks like it hasn't been cleaned in months. I haven't complained about it because last time I complained about a dirty room, an official made fun of me and made me cry.

It has been eight months since this ICE started making new rules about the coronavirus, but they are still endangering us.

24. There are still guards who walk around with their masks around their chin, or their masks off altogether, and who only put them on when their bosses are nearby. There are others who keep their masks in hand, and only put them on when another person comes close; but those guards don't seem to care that they are still breathing and talking and sneezing without masks on. And there are still many guards who wear their masks over their mouths but not their noses.
25. One time this month, I asked a guard in my hallway to put on a mask, as she was passing me in the hallway, within feet of me, without a mask. She said, "oh I forgot it," and I replied, "you should have found another." She said she would find another soon, but even as she was saying that, she was talking to me from about three feet away with no mask on.
26. I was talking to that particular officer at 2 AM because she had just woken us, and the other families in our hallway, red #2, to move us to red hallway #3. They were moving us because another family in our hallway had tested positive for COVID-19. That positive test was not at all surprising to us, as we had seen this woman coughing and looking ill for days. She had been transferred to our hallway from quarantine, but I can't imagine why. She was still coughing a lot and she even fainted twice in the kitchen and threw up in the park. They moved her back to quarantine after a few days in the red complex.
27. Now that I am quarantined in the medical annex, I worry even more about the ways that ICE is allowing the virus to spread through this detention center. The guards in my hallway in the medical annex, where they keep families who are COVID-positive with symptoms, change every day. There are guards who will work one shift here and then work the next day in the hallways

where the other families who aren't COVID-positive live. Before we were quarantined, there was a woman who worked in our hallway in the red complex; I saw her in red on Saturday and then later in the week in the medical annex. I don't understand why they can't keep just a couple officials here to supervise the quarantine unit, and make sure they don't mingle with the other families.

28. Similarly, the doctors and nurses who come to the medical annex to check on me and S.G.L. go back to the main clinic, where they consult with other families about their regular medical problems. I was shocked to see them go back to the main clinic after being exposed to S.G.L.
29. One of the doctors who came to check on us today, December 1, was the same doctor who brushed us off on Sunday when S.G.L. first presented COVID-19 symptoms. I told her I was upset that she had ignored his symptoms the first time he presented them, because he could have infected many other children. She said, "that's why we are isolating you now, so that he doesn't infect anyone else." I feel like she doesn't understand how this virus spreads.

I feel horrible that S.G.L. may have infected many other people, including some of my friends and their children who have illnesses that make them particularly vulnerable to COVID-19.

30. When the doctor told us that S.G.L. tested positive for COVID-19, I started to cry. I was crying because I was scared for him but also because I was furious. The doctor and nurses told me, "don't cry, be strong!" But I wanted to yell at them, "He's been sick since Sunday! How many people will have been infected since then?" From the first moment that a nurse saw S.G.L. on Sunday, they should have isolated him.
31. The nurses tell me that S.G.L. is strong, that his body is resisting the virus, and we're lucky that he's still breathing well. I still worry that he may have infected other kids who will not be as strong. Every day I think about the two year old daughter of my friend that S.G.L. was always hugging, and the three year old boy S.G.L. played with four whole days after his symptoms started. I pray that they don't fall sick.
32. I asked one of the doctors who came to check our vital signs whether there are other families in the medical annex too. He told me there were other families who "didn't pay any heed" to their instructions to cover their mouths, or to not meet with their friends, and that's why they are now sick in quarantine. I said nothing, but I kept thinking about how we are not the ones who brought this virus into the detention center. We have been here since last fall and have never left. It is the employees who come and go from here, and the new families just arriving, who are bringing COVID into this place.
33. I am very worried about the other families here, but also about the officers. There is one woman I have seen here in the medical annex who is quite old and very nice. We talk a lot, and I am inspired by her drive to keep working even at her age. But I worry about her catching the virus. It seems like the detention center doesn't care about its employees, making an older woman work around people who have tested positive for COVID; why can't they send younger adults to do this job? It's a shame; I think about her a lot and hope that she is okay.

Declaration of Mackenzie Levy

I, Mackenzie Levy, hereby declare under penalty of perjury as prescribed in 28 U.S.C. § 1746:

1. I am a legal assistant and Family Separation Coordinator with the Dilley Pro Bono Project where I have worked since August 2018.
2. I am fluent in the Spanish and English languages.
3. On November 30, and December 1, 2020, I spoke with M.P.O. by telephone. Given the COVID-19 pandemic in general, and M.P.O.'s medical isolation due to her positive COVID-19 test, I was unable to enter the South Texas Family Residential Center to meet with M.P.O. in-person.
4. During my telephone call M.P.O., I read the entirety of the "Declaration of M.P.O." in Spanish.
5. I swear under the penalty of perjury that M.P.O. confirmed that the information contained in the declaration is true and correct.

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

Executed November 30 and December 1, 2020 in San Antonio, Texas.


Mackenzie Levy