

DECLARATION OF TANIA MATTOS

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

1. I am the Policy and Northeast Monitoring Manager for Freedom for Immigrants (“FFI”), a national 501(C)(3) non-profit organization that seeks to end the isolation of people in immigration detention. I am competent to testify in this matter. My statement is based upon my personal knowledge, and my education, training, and experience.
2. FFI coordinates a network of community-led visitation groups, which offer support to people detained in 69 immigrant prisons and jails in 26 states with over 4,500 visitor volunteers. These visitor volunteers, who also receive phone calls and correspondence from people inside detention, also track support of people detained.
3. One of the community-led visitation groups with which we affiliate closely is First Friends of New Jersey & New York. Their visitor volunteers have been meeting with and receiving phone calls and correspondence from people inside immigration prisons and jails throughout New Jersey, including Elizabeth Detention Center (“EDC”). EDC is an immigration prison run by CoreCivic (previously known as the Corrections Corporation of America [CCA]), a private prison corporation that holds several contracts with ICE.
4. First Friends of New Jersey & New York has operated a hotline at EDC for many years, but EDC abruptly shut down the hotline in February of this year, without explanation. For a while, visitors could still meet with people who were imprisoned at EDC, but U.S. Immigration and Customs Enforcement (“ICE”) ended social visitation March of this year due to the COVID-19 pandemic,
5. Because of these developments, our network has very limited information about current conditions at EDC. We have reason to be deeply troubled by this, however, because we are still receiving information from people held in other CCA/CoreCivic facilities and/or their loved one.
6. From **April 10th, 2020 to May 12th, 2020**, FFI has received the following reports through from people in immigration detention and their loved ones regarding current conditions in the ICE detention facilities operated by CCA/CoreCivic listed below.
7. **Otay Mesa Detention Facility in San Diego, CA:**
 - a. May 7th, 2020: “Because of the virus, they have stopped cooking food and feeding us. We only get sandwiches every day and nothing more. 300 - 400

people in the facility are infected and one person died yesterday. I got sick twice, the first time was 2 months ago and they didn't give me access to a doctor to diagnose me. I was sick for weeks. I got sick the second time a few weeks ago and this time I got tested and they told me that I was positive for the virus. 3 months ago, when we started asking for protective equipment they didn't give us anything, no masks, no soap, nothing. It took them 25 days after the first case in our facility for them to give us masks and a small bar of soap each, but by then we were all sick.”

- b. May 1st, 2020: “Since April 20th we've only been given bread-based food (muffins, pizza, etc.). Because the kitchen staff is not working due to COVID-19. I feel very weak because of this. Every so often they might give us a piece of fruit, but not enough for us to remain healthy. In my country, people are starving. I didn't expect that to happen here as I came seeking asylum. I think I will get PTSD and will need treatment after everything I've lived through at Otay Mesa Detention Center.”
- c. April 23rd, 2020: “I am extremely weak from being on hunger strike for one week. The guards have been retaliating against me. I'm the one who organized this strike. I am kept away from other prisoners so I won't share ideas with them. I have had inadequate access to hygiene products. I grew fungus in my hair from lack of care. The guards are depriving me of sleep. They bang the doors at night, rattle their keys and keep the radio playing. I desperately want help finding a lawyer, pro-bono. I suffer from high blood pressure, asthma and a mental condition.”
- d. April 17th, 2020: “Although visitation is not allowed, the facility is saying they are allowing people to call without fees. However, I have been having to pay every time I make a call...There is no adequate air ventilation. The air is dirty, containing hair, dirt, etc. I heard officers saying that it has been over 4 years since they cleaned the ventilation system. The clothes that we are provided are old and belonged to people that were previously detained. Food is raw, not cooked properly. Chicken is not cooked properly, so there is a fear of salmonella. If the people refuse to eat the food, they are told that they are going to get the virus. The water tastes like bleach. Although it looks clear, it is not good for our health. People have tried to protest, but the officials have threatened to throw gas/pepper spray at them. Solitary is being used to determine if anyone has the virus. There was a case where someone tested positive, and they were still allowed to be with the general population. There was also a case where a person was sent to the hospital, but people are not informed about what happened to that person.”

8. La Palma Correctional Center in Eloy, AZ:

- a. May 6th, 2020: "I have really bad asthma and there have been multiple reported cases of COVID-19 amongst the detained people, but there are not precautions and there is no social distancing occurring."
- b. May 5th, 2020: "Food shortages have been going on for weeks. Yesterday, each person just received a slice of ham. I have been having trouble breathing but am not receiving adequate attention since November. I need medical attention."
- c. April 20, 2020 "When he was transferred to La Palma in November the treatment stopped. He was never re-evaluated. He can't breathe because of the allergies and is especially concerned because of the virus. We are afraid he will lose an eye, for which he was also told that he needed examination since November."
- d. April 20, 2020: "Food there is worse than dog food, my husband tells me it's not nutritious, yet they have to eat it because they have nothing else. Hygiene there is virtually non-existent. There is no soap or toilet paper, not free or for purchase. At that facility they lock them down, my husband just tells me that he might not be able to call me in a while because of the lockdowns. They never tell detained men what's happening, just leave them locked up all day long. Today there were rumors of someone collapsing."

9. Adams County Correctional Center in Natchez, MS:

- a. May 12th, 2020: "I fear for my life because I have Hepatitis B."
- b. May 12th, 2020: "A man in our area tested positive for Covid-19. His brother has told us this. We were given masks 3 weeks ago after we had a kind of riot. We wore towels on our faces to protest. We refused to go back to our barracks after the night count. Some of us refused to eat for a day. When we refused to go inside, the staff came back with gear, shooting us with beanbag guns at 10:30 pm. They used a sound grenade. I went on a hunger strike from March 1-13 and was taken to quarantine. The staff said they would refuse to mail a legal paper to my brother if I didn't stop my hunger strike, so I stopped. I can give medical information to prove that I have problems with bad asthma so I am in danger from the coronavirus."
- c. May 6th, 2020: "There is little or no social distancing being practiced as we are housed in close quarters of more than 100 detainees per dorm which makes me scared as I believe I am at a heightened risk of suffering life threatening complications if I am exposed to COVID 19 because I suffer from medical conditions."
- d. April 27th, 2020: "There are about 15 other people from India in this facility who want to be released. We all have family here who could help and support us, but our cases have been denied. We feel very unsafe."

- e. April 16th, 2020: “Conditions are really crowded. There are more than 150 people. It's impossible to distance and not touch things that other people have touched. There's not enough soap and sanitizer for the number of people. One dorm is quarantined because people there have symptoms, but no one can get tested or get their temperature taken. We are only getting bread to eat. There's no more cooked food. They gave us face masks but they're disposable and you're supposed to throw them away after one day, and they won't give us more.”

10. Stewart Detention Center in Lumpkin, GA:

- a. May 1st, 2020: “Myself and others with asthma and diabetes were isolated from the general population over a month ago. We were about 15 people in isolation, but now there are only four. The isolation is not mandated when it is time to eat. There are times that guards take those who are in medical solitary to eat with the general population, but other times they make us eat in our cells. We have asked for clarification and reasoning behind our isolation, but the officers refuse to communicate the reasons behind their protocols. We have to clean up their own living spaces. We are provided masks and gloves so that we are protected from chemicals when cleaning.”
- b. April 29th, 2020: “I am very worried and concerned. Me and 14 other people who also have medical conditions were isolated from the rest of the detained men in a room together as of April 1. 10 of the 14 have been released. He believes some may have been deported but others have been released to join their families. Some of the others left have fevers but have not been tested for the virus. I have not been given any information about whether I will be released and I am gravely concerned about my health.”
- c. April 23rd, 2020: “There are 70 people in a room. We have protective gear and access to soap, but it doesn't matter because the facility is too overcrowded and we are not receiving sufficient medical care. My friend is showing symptoms of COVID-19 and the guards are only giving him aspirin.”

11. Torrance County Detention Facility in Estancia, NM:

- a. May 12th, 2020: “The facility is not providing real facial masks. The guards are giving out masks that are made out of the uniforms of US Marshal detainees. The facility is not providing my brother with adequate medical care. He has serious pain in the gum of his teeth, and he cannot eat without terrible pain. They are simply giving him painkillers that are ineffective and they are not answering his lawyer's requests for good medical care. The facility is not properly washing detainees' clothes. When they give them the clothes after washing them they are still dirty. Several people are currently engaging in hunger strikes. The guards are making fun of them and provoking them with jokes. The food is of terrible

quality. Specifically, my brother complains of rotten milk. Hygienic standards are not respected. The facility does not give soap or other hygiene products. Detainees have to buy them from the commissary.”

12. Nevada Southern Detention Facility in Pahrump, NV:

- a. April 10th, 2020: “All of the women at the Nevada Southern Detention Center are very afraid. They do not think that the facility is equipped to care and protect them from the virus. New people are entering the facility without any check-ups (other than a basic physical exam) every day and being mingled with people who have been detained for months. Everyone feels vulnerable and can't focus on fighting their case. The commissary is closed so people cannot supplement their meals. No free phone calls.”

13. I, along with the other members at Freedom for Immigrants, are extremely concerned for the safety and well-being of people in ICE detention facilities, particularly those operated by CCA/CoreCivic. We are deeply frustrated and disturbed by the lack of efforts ICE and CCA/CoreCivic have made to implement policies and practices from ICE’s updated guidelines published on April 10, 2020. We fear that its actions are putting hundreds of individuals at serious risk of harm or death at all their centers but especially at the Elizabeth Detention Center.

I declare under penalty of perjury and under the laws of the United States, pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, memory, and belief. I executed this Declaration on the 13th day of May, 2020, in New York City, NY.



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