



October 6, 2021

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Re: COVID-19 Negligence, Sexual Assault, Retaliation, Verbal Abuse, Religious Discrimination, Anti-Blackness, and Deplorable Conditions at Krome North Services Processing Center in Miami, Florida

Dear Director Ripa, CRCL Officer Culliton-Gonzalez, and Project Manager Majeski,

UndocuBlack Network, Haitian Bridge Alliance, Freedom for Immigrants, and the National Immigration Project of the National Lawyers Guild, submit this complaint on behalf of Ernst Francois (A# 041-582-833), Johan Cruyff Jimstar Aceus (A# 060-981-012), and seven other individuals who wish to remain anonymous due to fear of retaliation. All are Black immigrants, five from Haiti, one from Sierra Leone, one from St. Lucia, one from Jamaica and one from the Bahamas, who are currently detained or have previously been detained at Krome North Service

Processing Center and have reported violations of their civil and human rights, including medical neglect, sexual abuse, religious discrimination, retaliation, verbal abuse from guards, anti-Blackness, and egregious COVID-19 endangerment by Immigration and Customs Enforcement (ICE). We urge the DHS Office for Civil Rights and Civil Liberties (CRCL), pursuant to its authority under 6 U.S.C. § 345, to immediately 1) Investigate the medical practices, religious and racial discrimination, sexual abuse, and COVID-19 negligence and 2) recommend the release of all individuals detained at Krome.

Anti-blackness is defined as “behaviors, attitudes and practices of people and institutions that work to dehumanize black people in order to uphold white supremacy,”¹ treatment and behavior that “strips Blackness of value.”² We are especially concerned that these instances of abuse fit within a long pattern of abuse and anti-Black racism that Black immigrants experience within ICE custody. The abuse which these individuals have been subject to falls within a clear pattern of racialized brutalization and discrimination against those in ICE custody, a practice which ICE leadership has effectively condoned.³ In fact, some of the signatories to this complaint letter submitted a similar complaint letter with your office in March 2021, alleging discriminatory practices and deliberate indifference related to the prenatal, maternal, gynecological, and pediatric medical needs of detained Black women and young children at the Karnes County Family Residential Center, to which we have received little response.⁴ According to CRCL’s mandate, allegations of discrimination based on race, ethnicity, national origin, religion, sex, sexual orientation, gender identity, or disability which occur in ICE custody must be investigated. There’s strong indication that a pattern and practice of racially based abuse of immigrants at Krome, and under the Miami Field Office at large, is taking place.

Testimonies

This complaint includes testimonies from nine Black immigrants currently and formerly detained at Krome Detention Center. The individuals who wished to remain anonymous do so in fear of retaliation and additional abuse after coming forward. Should you open an investigation, these individuals *may* be willing to report their allegations to oversight bodies. These testimonies demonstrate clear and utter disregard for the safety, well-being, and respect of those detained by ICE and Krome North Service Processing Center. The medical neglect, abuse, discrimination,

¹ “Terms and Definitions,” Amherst College, available at:

<https://www.amherst.edu/campuslife/our-community/multicultural-resource-center/terms-and-definitions>

² “Racial Equity & Anti-Black Racism,” University of California San Francisco, Multicultural Resource Center, available at: <https://mrc.ucsf.edu/racial-equity-anti-black-racism>

³ Black Alliance for Just Immigration and NYU School of Law Immigrant Rights Clinic, The State of Black Immigrants (September 2016), available at: <http://baji.org/wp-content/uploads/2020/03/sobi-fullreport-jan22.pdf>.

⁴ Complaint letter filed with CRCL by RAICES, Haitian Bridge Alliance, Cameroon American Council, and the UndocuBlack Network (March 2021), available at: <https://www.raicestexas.org/wp-content/uploads/2021/03/Redacted-Complaint-regarding-Inadequate-Medical-Care-of-Black-Pregnant-Women-and-Infants-at-Karnes.pdf>.

retaliation, and disregard of COVID-19 protocols are a direct violation of ICE's own detention standards and COVID-19 protocols, CDC guidance, and the U.S. Constitution.^{5 6}

All of the individuals in this complaint called the Freedom for Immigrants National Immigration Detention Hotline to share their testimony. These testimonies include a pattern or practice of:

- COVID-19 negligence;
- Medical neglect;
- Sexual abuse;
- Religious discrimination;
- Racial discrimination;
- Retaliation for peaceful protest and public reporting;
- ICE failing to follow court orders and release high-risk individuals suffering from complications related to COVID-19 from Krome;
- Verbal abuse by guards and officers;
- Deplorable conditions.

COVID-19 Negligence

Despite the most recent COVID-19 outbreak at Krome North Service Processing Center, the facility and its staff have continued to neglect the health and safety of the people in their care.⁷ People detained have reported to the Freedom for Immigrants National Immigration Detention Hotline that Krome has poor hygiene practices, no PPE, inadequate cleaning and disinfecting procedures, no efforts to implement any form of social distancing, inadequate cohorting of COVID-19 positive individuals, and lack of infection control. This negligence in providing basic preventative measurements for the spread of the COVID-19 virus is a direct violation of ICE's own ERO COVID-19 Pandemic Response Requirements (Version 5.0, October 27, 2020).

ICE and Krome Detention Center have an obligation to abide by the requirements and best practices put forth by Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) and the Center for Disease Control. ERO issued "mandatory requirements to be adopted by all detention facilities, as well as recommended best practices, to ensure that detainees are appropriately housed and that available mitigation measures are implemented during this unprecedented public health crisis."⁸ Additionally, ERO requires all facilities to

⁵ U.S. Immigration and Customs Enforcement (ICE) Performance Based National Standards (2011), available at: <https://www.ice.gov/doclib/detention-standards/2011/pbnds2011r2016.pdf>

<https://www.ice.gov/doclib/coronavirus/eroCOVID19responseReqsCleanFacilities.pdf>. (hereinafter "PRR"); Interim

⁶ Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities, Center for Disease Control and Prevention (Updated Dec. 31, 2020) available at:

https://www.cdc.gov/ccjbh/wp-content/uploads/sites/172/2020/04/CDC_guidance-correctional-detention.pdf

⁷ *Gayle v. Meade*, No. 1:20-cv-21553-MGC, ECF No. 8-1 (S.D. Fla April 13, 2020) (proposed settlement agreement setting forth specific requirements for detaining people during the ongoing COVID-19 pandemic). *See generally* Southern Poverty Law Center (SPLC) case page for *Gayle v. Meade*, describing the ongoing action seeking the release of all immigrants detained at three detention centers in South Florida, including Krome, available at:

<https://www.splcenter.org/seeking-justice/case-docket/gayle-et-al-v-meade-et-al>.

⁸ ERO COVID-19 Pandemic Response Requirements, Version 5.0, October 27, 2020, page 5, available at: <https://www.ice.gov/doclib/coronavirus/eroCOVID19responseReqsCleanFacilities.pdf>

“adhere to CDC recommendations for cleaning and disinfection during the COVID-19 response”⁹ which have also not been followed at Krome North Service Processing Center:

- *“An officer has died of COVID-19 and another officer is in critical condition on a ventilator. I am currently in a pod where a lot of people are infected with COVID-19 and spreading it rapidly to other people. We are not able to social distance, we have masks but they haven't been cleaned and we've had them for weeks. There is also no proper sanitation either.”* - Call to the Freedom for Immigrants Hotline, September 13, 2021
- *“The toilets are 2 feet apart from each other and the showerheads are only 3 feet apart from each other, we cannot social distance in this facility.”* - Letter from anonymous dated August 16, 2021
- *“People in this dorm are displaying COVID-19 symptoms and are really sick. There is no proper sanitation and no testing being done either.”* - Johan Cruyff Jimstar Aceus call on August 23, 2021
- *“Two people in my unit tested positive, the facility is infested with COVID-19. The facility is forcing staff to get vaccinated and as a result many staff members have quit which leaves the facility short staffed.”* - Call to the Freedom for Immigrants hotline, September 2, 2021
- *“We also did not receive proper medical care, PPE, or COVID-19 tests. I saw someone bleeding from his mouth and the facility didn't do anything to care for him.”* - Ernst Francios call on August 23, 2021
- On August 23, 2021, an anonymous caller reported to the Freedom for Immigrants hotline that Krome North Service Processing Center is mixing people who are COVID-19 positive with those who are not. In addition, the dorms are overcrowded, holding around 40 people to a dorm, which does not allow them to practice social distancing. Guards and staff are not wearing masks sometimes, and the facility is not testing people for COVID-19.
- On August 31, 2021, a person who wishes to remain anonymous reported to the Freedom for Immigrants hotline that people detained at Krome were informed that all dorms are in quarantine because some people in his dorm tested positive for COVID 19. A few moments before the announcement, they were all in the cafeteria together showing that there is no infection control.
- On August 23, 2021, Mr. Francois reported to the Freedom for Immigrants hotline that guards do not inform them about what is happening. He reports that the guards try to hide any information relating to COVID-19 in the facility from people detained.
- On September 14, 2021, a person who wishes to remain anonymous reported to the Freedom for Immigrants hotline that shortly after receiving the Johnson & Johnson vaccine, he started to feel a headache and mild body aches. He was then quarantined with people who were confirmed positive for COVID-19.
- On September 13, 2021, an anonymous caller reported to the Freedom for Immigrants hotline that one security officer died of COVID-19. The anonymous caller reports that a lot of the staff at Krome Detention Center are not vaccinated and therefore are spreading COVID-19 throughout the facility. He reports that the facility is understaffed because a few staff members are sick, and a lot of them are quitting rather than taking the vaccine.

⁹ Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities Updated Oct. 21, 2020)

The facility is quarantining and doing temperature checks but they are not administering COVID-19 tests.

ICE Fails to Follow Court Orders and Release Individuals at High-Risk of Contracting COVID-19 from Krome Detention Center

Age and pre-existing conditions put individuals at greater risk of contracting the COVID-19 virus and experiencing severe complications or death. The CDC and the court order in *Fraihat v. ICE* define certain high-risk populations that are at increased risk of severe illness from COVID-19.¹⁰ As set forth by the *Fraihat v. ICE* preliminary injunction and motion to enforce, ICE is required to review every case of *Fraihat* subclass members for custody redetermination, including those with COVID-19 risk factors such as diabetes, hypertension, asthma, and autoimmune disorders. However, it has been proven that ICE and Krome Detention Center has repeatedly failed to comply with the court's order:

- *"I am afraid of getting COVID-19. I suffer from serious medical conditions such as asthma, heart problems, and lung problems."* - Call to the Freedom for Immigrants hotline, August 23, 2021
- *"Since there is no proper sanitation or testing and COVID-19 is spreading in the facility, I am scared of getting COVID-19 since I have high blood pressure and I know people who test positive are not being medically treated until many days later."* - Johan Cruyff Jimstar Aceus call on August 23, 2021

Racial Disparity in Custody Decisions:

Decisions regarding release and parole are supposed to be made on an individualized, case by case basis, after consideration of numerous factors including whether the person is a flight risk, dangerous to the community, has medical impairments, and has cooperated with efforts to obtain travel documents. However, the nine Black immigrants making this complaint report that only Cubans are being released from custody at Krome North Service Processing Center. Of the population of Cubans released from Krome, several complainants noted that they were "white" or "light-skinned."

- *"Only white Cubans are being released. Compared to Haitians and Jamaicans, we did not see any releases at all while white Cubans were being released."* - Anonymous caller to the FFI hotline September 9, 2021
- *"All Cubans that I know of that got released are white/light-skinned."* - Anonymous caller to the FFI hotline September 9, 2021
- *"Many white Cubans were released, when no Black and Haitian detainees had been released. I can confirm that all of the Cubans who were released were white."* -Ernst Francois call to the FFI hotline September 9, 2021

It is known that Black immigrants spend disproportionately more time in detention than others and experience abuses at a higher rate.¹¹ Black immigrants from Africa and the Caribbean are

¹⁰ Order, *Fraihat, et al v. U.S. Immigration and Customs Enforcement, et al*, No. 5:19-cv-01546-JGB-SHK, ECF No. 132 (C.D. Cal. Apr. 20, 2020). ("[ICE] shall make timely custody determinations for detainees with Risk Factors, per the latest Docket Review Guidance[.]")

¹¹ See Char Adams, *Black immigrants have been left out of policy decisions for too long, organizers say*, NBCNews (Aug. 24, 2021) ("[B]ond amounts for Black immigrants were routinely higher than those for non-Black immigrants

already vastly overrepresented in solitary confinement in comparison to the share of these groups in the overall detained population, and African immigrants are disproportionately more likely to be confined for disciplinary reasons.¹²

These testimonies indicate that racial discrimination plays a role in decisions regarding the release of Black immigrants detained at Krome. CRCL should investigate this apparent racial disparity in custody decisions, and whether and how anti-Black racism affects the custody decisions of ICE personnel at Krome North Service Processing Center.

Retaliation

According to the 2019 Performance Based National Standards that ICE and Krome North Service Processing Center are required to follow, “staff will not harass, discipline, punish, disclose sensitive information about, or otherwise retaliate against a detainee lodging a complaint.”¹³ Despite these policies, people detained at Krome North Service Processing Center reported to the Freedom for Immigrants National Immigration Detention Hotline several instances of retaliation. Rather than responding to grievances and remedying conditions, Krome responded by punishing and silencing those who reported them:

- On September 10, 2021, Johan Cruyff Jimstar Aceus called the Freedom for Immigrants hotline and reported that after his religious hat was removed by Officer Smith, he went onto a tablet and filed a grievance about what happened. Mr. Aceus reports that an hour later the Warden pulled him out, asked him about what happened. When he told her to review the camera she said it wasn’t that serious and that she was going to transfer him to another facility which she did on August 21, 2021, right after the grievance was filed.
- On August 23, 2021, Mr. Aceus and a person who wishes to remain anonymous reported to the Freedom for Immigrants hotline that many Haitians and other individuals went on hunger strike and the entire facility was put on lockdown by Captain Liche.
- On August 17, 2021, Mr. Francois called the Freedom for Immigrants hotline and reported that the individuals who were on hunger strike were handcuffed, taken to solitary confinement, and denied access to phones.

Medical Neglect

ICE and Krome Detention Center have a constitutional obligation to provide adequate medical care to everyone detained. *See generally Estelle v. Gamble*, 429 U.S. 97 (1976). This medical neglect is in violation of both the U.S. Constitution and ICE’s own 2019 Performance Based

from June 2018 to June 2020. So detained migrants end up staying in immigration detention for long periods of time — sometimes indefinitely — because they can’t afford the disproportionately high bonds.”), available at: <https://www.nbcnews.com/news/nbcblk/black-immigrants-left-policy-decisions-long-organizers-say-rcna1747>; Refugee and Immigrant Center for Education and Legal Services (RAICES), *Black Immigrant Lives Are Under Attack* (online report of disparities experienced by Black immigrants in ICE detention), available at: <https://www.raicestexas.org/2020/07/22/black-immigrant-lives-are-under-attack/>.

¹² Franco, K., Patler, C., & Reiter, K., *Punishing Status and the Punishment Status Quo: Solitary Confinement in U.S. Immigration Prisons, 2013-2017*, Punishment & Society (October 2020), available at: <https://doi.org/10.1177/1462474520967804>.

¹³ U.S. Immigration and Customs Enforcement (ICE) Performance Based National Standards (2011), Section 6.2 Grievance System, page 183, available at: <https://www.ice.gov/doclib/detention-standards/2011/pbnds2011r2016.pdf>

National Standards.¹⁴ The Freedom for Immigrants National Immigration Detention Hotline has received multiple reports in recent months from individuals detained at Krome Detention Center with medical illnesses and issues that are not being treated:

- On August 26, 2021, a person who wishes to remain anonymous reported to the Freedom for Immigrants National hotline that the medical professionals at Krome Detention Center were not adequately documenting his medical issues which included A1C diabetes, anemia, high blood pressure, and hypertension, all of which are criteria for consideration to be released on Fraihat. The medical professional rather just documented “diabetes with no complications” and left out the other chronic illnesses.
- On August 23, 2021, a person who wishes to remain anonymous reported to the Freedom for Immigrants hotline that last month he was severely ill and believed he had COVID-19 but was never given a test. He had a cold, headache, and chills, and he did not receive proper medical care. After four requests he was finally taken to see the nurse but was only given painkillers. Additionally, on June 17, 2021, his glasses were taken away because they were metal and the medical providers have not replaced them. Due to not having his glasses, he now experiences severe migraines and cannot see properly. The medical staff told him they would schedule an appointment to see a doctor but nothing has happened.
- On August 23, 2021, a person who wishes to remain anonymous reported to the Freedom for Immigrants hotline that he has asthma, heart problems, diabetes, shortness of breath and lung issues and reports that he spent 6-9 days in the hospital but that the medical professionals at Krome still do not address his medical problems.
- On August 11, 2021, a person who wishes to remain anonymous reported to the Freedom for Immigrants hotline that he has high blood pressure, high cholesterol, and diabetes. After receiving inconsistent reads of his blood pressure from the nurse and other medical providers, he believes that the medical personnel were misrepresenting and downplaying his actual blood pressure reading in order to avoid having to take further action. He experiences dizziness, headaches, and poor sleep on a daily basis. In addition, he has received a few tests but has not received the results nor has access to his medical records.

Inhumane Conditions & Inadequate Nutrition

People detained at Krome Detention Center have reported deplorable, dangerous, and unsafe conditions inside the facility:

- *“The top bunks do not have a rail or guard on them so many people have fallen off the second bunk in their sleep and have injured themselves.”* - Letter from anonymous dated August 16, 2021
- *“Above all reports, we are called by our A# and not our name, taking the name out, takes the human out of a person and makes us feel inhumane.”* - Letter from anonymous dated August 16, 2021
- *“The food is horrible and we are given small portions. We only get two outfits and we sleep on metal slaps. We are only allowed to use nail clippers and hair clips once a*

¹⁴ U.S. Immigration and Customs Enforcement (ICE) Performance Based National Standards (2011), available at: <https://www.ice.gov/doclib/detention-standards/2011/pbnds2011r2016.pdf>

month, it is degrading. ICE has taken his dignity, integrity, and personhood.” - Call to the Freedom for Immigrants hotline, September 2, 2021

- *“We have not been given proper amounts of food because the cafeteria has been shut down due to COVID-19.”* - Call to the Freedom for Immigrants hotline, August 23, 2021
- *“We only have 20 minutes to collect and eat our food. If you don't finish your food in the allotted time, the officers will throw away your food.”* - Letter from anonymous dated August 16, 2021

Discriminatory Language and Verbal Abuse

Verbal abuse and mistreatment of individuals detained at Krome Detention Center have been extensively documented prior to this complaint. One article listed reports by both guards and previously detained individuals documenting the physical, racial, and verbal abuse at Krome Detention Center.¹⁵ In April 2021, Freedom for Immigrants filed a Civil Rights and Civil Liberties complaint documenting homophobic, racist, and Islamophobic comments made by guards at Krome Detention Center. The testimonies below demonstrate that this is a long-standing, systemic problem at Krome Detention Center:

- On August 23, 2021, Ernst Francois called the Freedom for Immigrants hotline and reported that the ICE Supervisor was loud and verbally abusive when he asked to speak to her supervisor.
- *“Since I have arrived at Krome Detention Center, I have witnessed bullying from guards.”* - Anonymous call on August 23, 2021
- On August 23, 2021, a person who wishes to remain anonymous reported to the Freedom for Immigrants hotline that the Captain has also been verbally abusive when individuals asked them questions.
- On August 18, 2021, a person who wishes to remain anonymous reported to the Freedom for Immigrants hotline that when he and others asked the ICE Supervisor for information regarding their case, the ICE Supervisor threatened them, insinuating that ICE had private planes to deport them and threatened them with solitary confinement.

Forced Signatures for Deportation Documents

The use of coercion and force to have individuals in ICE custody involuntarily sign documents relating to their deportation is a continued pattern and practice that ICE's leadership has ignored. This is evident in the multiple official complaints submitted to CRCL and OIG to call for an investigation into ICE officers' and prison guards' illegal use of threats, coercion, and physical violence to obtain signatures. In the past six months, concerned advocates filed complaints at Winn Correctional Center¹⁶ (Aug 7, 2020), Pine Prairie Detention Center¹⁷ (Aug 26, 2020), Adams County Correctional Facility¹⁸ (Oct 7, 2020), and Jackson Parish Correctional Facility

¹⁵ Bach, Trevor, “Guards and Immigration Detainees Describe Widespread Abuse at Krome Processing Center,” The Miami New Times, August 18, 2015, available at: <https://www.miaminewtimes.com/news/guards-and-immigration-detainees-describe-widespread-abuse-at-krome-processing-center-7829882>

¹⁶<https://documentcloud.adobe.com/link/track?uri=urn:aaid:scds:US:7bbe78f6-75e5-4d3c-a155-549b8a3fb1a8>

¹⁷ https://www.splcenter.org/sites/default/files/8.26.20_crcl_letter.pdf

¹⁸<https://static1.squarespace.com/static/5a33042eb078691c386e7bce/t/5f7f17f39e044f47175204fb/1602164723244/Re+CRCL+Complaint+ICE%27s+Use+of+Torture+to+Coerce+Immigrants+to+Sign+Immigration+Documents+at+Adams+County+Correctional+Facility.pdf>

(Nov 5, 2020).¹⁹ All five of these complaints, including the testimonies below corroborate the growing number of cases involving ICE officers' and prison guards' illegal behavior to obtain involuntary signatures on deportation documents:

- *“Since I have arrived at Krome Detention Center, I have witnessed ICE guards pressure people into signing their deportation orders when many cannot read, write, or understand what is going on with their case.”* - Anonymous call on August 23, 2021
- On August 23, 2021, a person who wishes to remain anonymous called the Freedom for Immigrants hotline and reported that ICE Officer Betty Catalina has been bullying him and forcing him to sign documents for his deportation even though he cannot read or write. This caller also reported that he is being verbally abused by ICE officers and being called racist derogatory names.

Sexual Assault

ICE's own National Detention Standards standards specify that, per DHS PREA Standards, ICE detention facilities must adhere to a zero-tolerance policy for all forms of sexual abuse and assault.²⁰ Yet, Freedom for Immigrants received reports of sexual assault and unwanted touching at Krome Detention Center:

- *“The toilets are in an open area, people detained have to expose themselves to each other while using the bathroom. It is really humiliating and makes us uncomfortable in our own skin. There is a surveillance camera right in front of the toilet which makes people detained expose themselves to whoever is watching. The shower is also in an open setting which encourages ‘indecent exposure’”* - Letter from anonymous, dated August 16, 2021
- On August 23, 2021, Mr. Ernst Francois reported to the Freedom for Immigrants hotline that guards consistently searched him. He reports that the guards touch his private areas daily about 16 times a day. Mr. Francois has reported that he constantly feels violated and uncomfortable by the unnecessary search and touching.
- On September 3, 2021, a person who wishes to remain anonymous reported that he was touched inappropriately by Officer Smith. His pants were pulled down, and he was given a “wedgie” by male Officer Smith. This caller reports that other individuals in the facility have also experienced this behavior from Officer Smith.

Denial of Right to Practice Religion

- On September 10, 2021, Johan Cruyff Jimstar Aceus called the Freedom for Immigrants hotline and reported that during a morning routine on August 27, 2021, Officer Jamar Smith became aggressive and angry and snatched his religious hat off his head. When Officer Smith snatched the hat off of Mr. Aceus, it was so aggressive that it almost felt like a slap. Mr. Aceus reports *“This hurt me a lot, I felt violated. I have the right to practice my religion.”*

Conclusion & Recommendations

¹⁹ <https://www.freedomforimmigrants.org/torture-deportations-black-immigrants>

²⁰ U.S. Immigration and Customs Enforcement (ICE) Performance Based National Standards (2011), available at: <https://www.ice.gov/doclib/detention-standards/2011/pbnds2011r2016.pdf>

Given the clear pattern and practice of abuse and torturous conditions at Krome Detention Center as documented above, we demand the following:

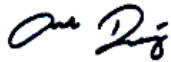
1. The DHS Office of Civil Rights and Civil Liberties should immediately open an investigation regarding the discriminatory practices, medical practices, religious discrimination, sexual abuse, and COVID-19 negligence against people detained at Krome Detention Center, particularly Black people.
2. All individuals detained at Krome Detention Center should be released to the community, especially those who qualify under the court order in *Frailhat v. ICE*. We remain extremely concerned that the conditions inside Krome Detention Center are egregious and unlivable where individuals continue to receive inadequate medical care. Krome North Service Processing Center has proven itself unable and unwilling to provide those in its care with safety and due process.

We look forward to your prompt attention to this issue. Please provide a response in writing regarding these matters by Monday, October 18, 2021 to the undersigned.

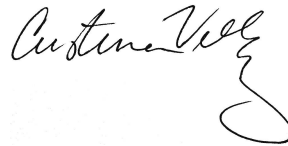
Sincerely,



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