



**FREEDOM  
FOR IMMIGRANTS**

**CREEC**

**SOLA E**



AL OTRO LADO



Stephen Phillips, JD, PsyD, Chairperson  
Enforcement Committee  
Board Of Psychology  
1625 North Market Blvd., Suite N-215  
Sacramento CA 95834  
bopenforcement@dca.ca.gov

Mark Paramo, Assistant Officer in Charge  
Mark.Paramo@ice.dhs.gov  
Immigration and Customs Enforcement  
Enforcement and Removal Operations  
San Diego Field Office  
880 Front Street #2242  
San Diego, CA, 92101

CC:

Katherine Culliton-González, Officer  
Office for Civil Rights and Civil Liberties  
Department of Homeland Security  
Compliance Branch, Mail Stop # 0190  
2707 Martin Luther King, Jr. Ave., SE  
Washington, DC 20528-0190  
CRCLCompliance@hq.dhs.gov

Christopher J. LaRose, Senior Warden  
Christopher.LaRose@corecivic.com  
Otay Mesa Detention Center  
P.O. Box 438150  
San Diego, CA 92143-8150

David Gersten, Acting Ombudsman  
David.Gersten@hq.dhs.gov  
Immigration Detention Ombudsman  
U.S. Department of Homeland Security  
Mail Stop 0134, Washington, D.C. 20593

March 8, 2022

RE: **Multi-Individual Complaint regarding Unprofessional, Unethical, and Negligent Treatment by Dr. Hryso Fernbach at Otay Mesa Detention Center**

Dear Dr. Phillips:

The undersigned nine organizations file this complaint to the California Board of Psychology (“BOP”) on behalf of twelve individuals currently or previously detained by U.S. Immigration

and Customs Enforcement (“ICE”) at the Otay Mesa Detention Facility (“Otay Mesa”) in San Diego, CA, regarding unprofessional, unethical, and negligent acts committed by Dr. Hryso Fernbach (CA BOP license #: 26472).

The following individuals have made concerning reports to the undersigned legal or advocacy organizations regarding Dr. Fernbach’s unprofessional and unethical behavior over the past year:

- Alex “Ibrahim” Cerrato Maradiaga (A#<sup>1</sup>: 029-154-257), currently detained at Otay Mesa;
- Hugo Chavarria del Aguilar (A# 077-455-770), currently detained at Otay Mesa;
- Artemio Garcia Illenes (A# 092-169-635), currently detained at Otay Mesa;
- Elenilson Armando Coto Delgado (A# 029-212-247), currently detained at Otay Mesa;
- Oscar Loya Leon (A# 073-445-689), currently detained at Otay Mesa;
- Erik Mercado Arechiga (A# 075-486-845), currently detained at Otay Mesa;
- Sulieto Guitche Domingo Jr (A#: 204-621-236), released from Otay Mesa;
- Sergio Manrique Gutierrez (A#: 092-081-582), released from Otay Mesa;
- Junior Jerome (A#: 077-846-417), released from Otay Mesa;
- Fernando Ortiz Garcia (A#: 096-605-265), released from Otay Mesa;
- Israel Rodriguez (A#: 086-970-539), released from Otay Mesa; and
- R.R., an individual who has been released from Otay Mesa and wishes to remain anonymous due to fears of retaliation in his ongoing immigration court proceedings.

Their concerns cover a range of unprofessional and unethical behavior from Dr. Fernbach, notable for the consistency with which individuals housed across the facility reported them:

- dismissiveness and refusal to believe patients’ reporting of symptoms;
- accusations towards patients of “faking” or “changing stories”;
- appointments that last a few minutes and diagnoses within that same time frame;
- lack of concern for patient privacy;
- mocking, hateful derogatory language;
- hostility towards private practitioners that offer second opinions; and
- poor clinical notes/documentation.

In this complaint, we cite:

- two independent medical reviews of Dr. Fernbach’s patients’ charts by established and prestigious psychiatrists;
- three previously filed complaints to ICE’s oversight bodies at the Department of Homeland Security (“DHS”) regarding Dr. Fernbach’s mistreatment, none of which have resulted in any relief; and
- three more recent reports from individuals who remain detained in Otay Mesa and continued to report being harmed by the unprofessional behavior of Dr. Fernbach, who is,

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<sup>1</sup> An “A#” or “Alien number” is the identification number assigned to individuals by ICE.

per facility staff, the only psychologist available for the approximately 750 individuals in ICE detention at Otay Mesa.

Given the clear and evident failure of DHS to protect individuals detained at Otay Mesa from continued harm by Dr. Fernbach, we respectfully request that the BOP promptly and thoroughly investigate the individuals' reports. We also request that this complaint be submitted to the Attorney General for consideration of disciplinary action to protect detained individuals from further harm from Dr. Fernbach, including revocation of her license to practice psychology.

### **Independent medical reviews of Dr. Fernbach's patients' charts**

#### **Junior Jerome**

Mr. Jerome entered ICE detention at Otay Mesa in October 2020. Within a few months, Mr. Jerome disclosed symptoms of severe, formerly untreated mental illness to his attorney. His attorney encouraged him to seek mental health treatment and later referred him for an independent psychological evaluation, which was conducted in July 2021. While interviewing Mr. Jerome, the evaluating clinician discovered he was actively psychotic and acutely suicidal. The clinician alerted Otay Mesa medical staff, and Mr. Jerome was segregated for several days. He was not freed from ICE detention until October 2021.

Dr. James Recht, MD, Assistant Professor of Psychiatry at Harvard Medical School, reviewed roughly 560 pages of records relevant to the care of Mr. Jerome dated October 2020 through August 2021 as well as Mr. Jerome's declaration dated June 19, 2021. Dr. Recht's findings, detailed in the attached January 9, 2022 declaration, are as follows:

- *Mr. Jerome received substandard medical and mental healthcare while in ICE custody;*
- *Mr. Jerome's suicidality was in part precipitated by the provision of this substandard care;*
- *Mr. Jerome's persistent mental health problems have been prolonged or exacerbated by this substandard care.*

More specifically, Dr. Recht made the following observations regarding Dr. Fernbach's notes in Mr. Jerome's record, which can also be found in the attached 2022 declaration:

- *a serious clinical error to dismiss current complaints based on previous absence of complaints;*
- *essentially meaningless boilerplate text that has no relevance to the patient's current condition;*
- *no evidence that Dr. Fernbach has reviewed the patient's chart;*
- *dismissive innuendo;*
- *strongly suggests prejudice on the part of the clinician;*

- *no data is provided to support this diagnosis;*
- *absence of prior treatment is not an indicator of absence of current symptoms;*
- *no evidence is provided, here or anywhere else in the record, of actual malingering.*

### Mr. RR

Mr. RR entered ICE detention at Otay Mesa in March 2020. While detained, Mr. RR was frequently referred to mental health providers by guards and medical staff who were concerned about his psychiatric condition. In July 2020, a suicide attempt by drug overdose resulted in Mr. RR spending over three days at Paradise Valley Hospital in National City undergoing psychiatric evaluations. He was finally released from Otay Mesa in March 2021.

Dr. Sonya E. Gabrielian, MD, MPH, Assistant Professor in the Department of Psychiatry and Biobehavioral Sciences at the UCLA David Geffen School of Medicine, reviewed approximately 302 pages of records relevant to the treatment of Mr. RR dated from June 4, 2020 to September 10, 2020. In a declaration dated January 17, 2022, Dr. Gabrielian concluded the following upon her review of the charts:

- *It is clear to me that the inadequate care Mr. RR has received in custody contributed to his suicide attempt and likely will result in continued deterioration of his overall functioning. The care Mr. RR received in detention is below an acceptable standard of care.*

Again, more specifically regarding the negligent treatment, Dr. Gabrielian notes:

- *Despite repeated presentations with psychotic symptoms (marked most prominently by a deeply entrenched delusional structure) and a clear pattern of help-seeking behavior (i.e., repeated requests medical attention for distress and somatic concerns), Mr. RR was not promptly referred for psychiatric evaluation and/or consideration of psychotropic medication management by other medical staff...*
- *Throughout the reviewed records, there are several notations that Mr. RR's primary psychiatric diagnosis could be "malingering." ... In my professional experience, false classification of malingering often results in inappropriate delays in psychiatric care for individuals in true need of treatment.*

### **Previous Complaints Regarding Dr. Fernbach**

Alex "Ibrahim" Cerrato Maradiaga, Hugo Chavarria del Aguilar, Artemio Garcia Illenes, and Fernando Ortiz García

On July 3, 2021, the SOLACE (Souls Offering Loving And Compassionate Ears) Interfaith Detention Center Visitation Project filed a complaint regarding Dr. Fernbach's mistreatment to the Department of Homeland Security Office for Civil Rights and Civil Liberties, the ICE San

Diego Field Office, and senior CoreCivic leadership at Otay Mesa on behalf of multiple individuals. SOLACE's complaint included the following:

- *Each of these men has reported that the standard of medical care they are entitled to for their diagnoses are not being met, and there is a troubling consistency to the behavior of the doctors they cite of which you should be aware.*
  - *Ibrahim Cerrato Maradiaga reports that Dr. Fernbach diagnosed him within two minutes, rejecting Maradiaga's claims that he hears voices, a problem he has had for eighteen years, with medical records from the [California Department of Corrections] to prove it.*
  - *Hugo Chavarria del Aguilar reports that his PTSD, major neuro-cognitive disorder from traumatic injury, major depressive disorder, and hallucinations from schizophrenia are being ignored by Dr. Fernbach... He reports constant voices, the volume of which have gotten worse without proper medication.*
  - *Fernando Ortiz García reports that Dr. Fernbach does not want to give him the depression and anxiety medication he was given in jail and on parole.*
  - *Artemio García Illenes reports Dr. Fernbach simply dismissed the report [of him "hearing voices"] as not being real.*

#### Sulieto Guitche Domingo Jr

On July 28, 2021, the Civil Rights Education and Enforcement Center (CREEC) filed a complaint regarding violations of civil, constitutional, and disability rights on behalf of Mr. Guitche to the Department of Homeland Security Office for Civil Rights and Civil Liberties. CREEC's complaint included the following:

- *Mr. Guitche went to see Dr. Fernbach, the psychologist at Otay Mesa, to discuss his anxiety, depression, and PTSD with a mental health professional. During a session in April 2021, Mr. Guitche expressed that he was unable to sleep due to nightmares and flashbacks.... Dr. Fernbach responded: "why are you just having flashbacks now, are you trying to get Franco?"<sup>2</sup> Mr. Guitche was upset and confused at this response because he went to Dr. Fernbach to share his mental health concerns and seek solutions and was instead met with hostility and suspicion. He also has legal representation and does not need to utilize the relief provided by the Franco settlement. Mr. Guitche did not feel that he could trust or confide in Dr. Fernbach after this incident.*
- *Mr. Guitche felt that he was forced to show her the cuts on his wrists, the result of a suicide attempt in prison, to force Dr. Fernbach to take him seriously. He feels that Dr. Fernbach does not believe anything he says and that she thinks he is a liar. Mr. Guitche*

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<sup>2</sup> Franco v. Holder is a class action lawsuit brought on behalf of detained immigrants with mental disabilities in Arizona, California, and Washington. In 2013, a federal district judge ordered ICE, the Attorney General, and the Executive Office of Immigration Review to provide legal representation to detained immigrants with mental disabilities who are facing deportation and who are unable to adequately represent themselves in immigration hearings.

*reports that he filed multiple grievances seeking mental health care from another provider but was repeatedly told that Dr. Fernbach is the only option available.*

- *Although he has been released, he and CREEC remain concerned that the conditions that he experienced continue to harm other people in detention at Otay Mesa.*

### Sergio Manrique Gutierrez

On September 17, 2021, Freedom for Immigrants (FFI) filed a complaint regarding Dr. Fernbach's mistreatment on behalf of Mr. Gutierrez to the Department of Homeland Security Office for Civil Rights and Civil Liberties, the ICE San Diego Field Office, the Department of Homeland Security Office of the Immigration Detention Ombudsman, and senior CoreCivic leadership at Otay Mesa. FFI's complaint included the following:

- *As demonstrated in the attached 29-page neuropsychiatric evaluation completed by Dr. Julie Kuck in December 2020, Mr. Gutierrez has struggled with psychotic and mild neurocognitive disabilities for many years... Despite Mr. Gutierrez's expressed need for and interest in mental health treatment, he is not receiving appropriate or adequate psychological care while detained at Otay Mesa. Mr. Gutierrez's mental health has rapidly deteriorated at Otay Mesa under the care of CoreCivic. Starting in May 2021, Mr. Gutierrez began to report concerns about the unprofessional conduct of Dr. Hryssio Fernbach, the psychologist that Otay Mesa has provided to him. Dr. Fernbach engages in harmful behavior such as gaslighting, dismissiveness, refusal to believe lived experiences, rushed and inaccurate diagnoses, and mocking, hateful language. Mr. Gutierrez wrote about his concerns in a grievance he filed with CoreCivic in August 2021:*
  - *"I had an appointment with Mental Health Provider (MHP) Fernbach. On that day I was in her office and within 3 minutes she said to me, 'There is nothing wrong with you... Let me guess, you've been here since you were a little kid and this is all you know... You want me to write you a letter for the Judge so he can let you stay here.' I then said, 'No, I don't have court anymore, I am actually here just to talk because I have had an independent psychiatric evaluation done and want to talk about some of the diagnoses.' She then says 'the hired gun... your attorney hired someone to say what you want them to say'...*
  - *I've been battling with mental illness since 2002 and it has taken me this long to finally open up and talk about it. Most important, to trust someone!... I was confused by MHP Fernbach's derogatory comments filled with hatred which only made me feel [sic] worse than I did before seeing her... It is absurd and unprofessional.... transgresses the line between permissible practice and malpractice. I couldn't stop thinking about the things that she said to me and how she said them. I started doubting everything in my life and felt very confused and fell into a depressed state. I am just now finding the will and energy to relive that moment as I write this.... MHP Fernbach should be held accountable for her*

*actions. I'm sure that I am not the only person that has been affected by her unprofessional and harmful way which is toxic to anyone's mental health."*

- *In stark contrast, Dr. Fernbach's notes regarding Mr. Gutierrez's medical record describe an entirely different patient and relationship: "He has no current issues and feels well... No distress is noted... No internal preoccupation is observed."*
- *Notably, Freedom for Immigrants has received very similar complaints about Dr. Fernbach's unprofessional and harmful conduct from at least eight other individuals detained at Otay Mesa.*
- *When Mr. Gutierrez attempted to seek help from Dr. Fernbach for his mental health disabilities, he was met with hostility and suspicion. Mr. Gutierrez has experienced significant harm as his attempts to address his mental health disabilities have resulted in depression, confusion, and desperation... There is a substantial likelihood that Mr. Gutierrez will face further harm should he remain detained at Otay Mesa.*

### Continuing reports of harm

Mr. Israel Rodriguez was released from ICE detention at Otay Mesa in 2020. On January 26, 2022, Mr. Rodriguez summarized what he remembered from his attempts to obtain medical treatment while in detention, and explained why he continues to feel deep concerns about the individuals who remain detained at Otay Mesa:

- *During my time at the jail I was able to witness and endure the detrimental treatment that was being provided by the mental health staff at the facility... The service provided was not only valueless but harmful itself. You were told that they couldn't help you and right away it was assumed that you were lying/faking and that you only wanted sympathy for your case. When I asked how I could deal with some of the intense post-traumatic stress disorder symptoms that I was experiencing, I was told to "just suck it up" and "stop complaining"; that "I was lucky to even be here"; and that "I should be happy with that." I was appalled when I asked what treatment I would receive for my illness and I was told, "none." The whole time there I was never offered any relief and it led to the deterioration of my mental state and the worsening of my symptoms.*
- *When I was finally seen by an independent clinician, I was diagnosed with acute Post-Traumatic Stress Disorder (PTSD) (according to the Diagnostic and Statistical Manual of Mental Disorders, [DSM]-5) and Exposure to War, Disaster and other Hostilities (according to the International Statistical Classification of Diseases and Related Health Problems [ICD]-10), all which was aggravated by the complete lack of care.*
- *This experience was shared by many. I witnessed how that deprivation of this most basic right led people to self-harm by cutting themselves, swallowing things like batteries and paper clips and even trying to hang themselves. Most detained individuals I met were seeking asylum and the vast majority had undergone severe traumatic experiences, which they were not receiving any help for at all. The pressure of fighting a major legal case*

*under these circumstances cannot be understated and could lead to depression and desperation in most everyone. It is such a human necessity to have a stable state of mind and these conditions make it impossible.*

- *If the system continues like this, it will continue to harm everyone who tries to seek treatment and prey even more on the already abused.*

Unfortunately, as Mr. Rodriguez aptly points out, and despite multiple complaints filed to federal agencies by various legal and advocacy organizations, no action has been taken to protect those in ICE custody at Otay Mesa from the continuing harm inflicted by Dr. Fernbach. Here are three recent reports from individuals who remain detained at Otay Mesa:

- Elenilson Armando Coto Delgado
  - Mr. Coto has reported to SOLACE on multiple occasions, and as recently as January 24, 2022, that he sought care from Dr. Fernbach on multiple occasions for nightmares, panic, insomnia and hearing the voices of his former torturers in El Salvador when he tries to sleep. He reports that Dr. Fernbach characterized him as a drug user when he has never used drugs, and that she "yelled" at him, calling him a liar and a faker. Mr. Coto says the interactions with Dr. Fernbach exacerbated his panic, and that hers is now one of the voices he hears at night when he tries to sleep.
- Oscar Loya Leon
  - On November 29, 2021, Mr. Loya recounted the following to Freedom for Immigrants:
    - *"I was telling Dr. Fernbach that I sometimes hear voices telling me to do something bad and Dr. Fernbach said "Why don't you just do it?" Instead of helping me, she makes violence more likely. I have taken medication for two years; it doesn't work anymore. They changed me to a medication that hurts my stomach. So now I don't have any medication that helps me. I asked, "Why isn't there a medication that helps me?" She said, "Because your problem doesn't exist."*
- Erik Mercado
  - On November 29, 2021, Mr. Mercado reported succinctly to Freedom for Immigrants that Dr. Fernbach *"talks to us like we're animals."*

### History of widely publicized reports of unprofessional behavior associated with destructive impacts to patients and others

Confusion and concerns regarding multiple reports of Dr. Fernbach's unethical and unprofessional behavior led the undersigned organizations to attempt to learn more about Dr. Fernbach's professional background. What we learned from even just a cursory Google search is disturbing, and not just for its consistency with the reports from individuals currently detained at Otay Mesa.



On May 11, 2009, Army Sergeant John M. Russell fatally shot five U.S. military personnel at a military counseling clinic at Camp Liberty in Iraq. Prior to the massacre Sgt. Russell had an appointment at the clinic during which there was a “heated argument” between Sgt. Russell and clinic personnel. Of relevance to this complaint is the fact that the clinic personnel in this tragedy included Dr. Fernbach. At military hearings in 2011 regarding the mass shooting, civilian defense attorney James Culp argued that the treatment Dr. Fernbach provided before the massacre was not only "mental health mistreatment" but also "a significant causal factor," akin to pushing “a man on the edge over the cliff.”<sup>3</sup>

- *Days earlier, Russell had seen Maj. Hryso Fernbach, an Army Reserve psychologist who before the visit had criticized her nurse, Capt. Blaine Ropson, for being “too nice” to patients, Ropson testified. “She felt I needed to be a little sterner. And I think her comment was, ‘I’m going to show you how we should be doing this,’” Ropson said. She proceeded to question Russell in a “pretty hostile and aggressive” manner, Ropson said. “I felt very uncomfortable.”<sup>4</sup>*
- *Ropson, who sat in on the session with Russell, said later that the patient was uncomfortable with the major’s “hostile,” “demeaning” and “antagonistic” attitude. Russell kept looking to Ropson for reassurance. Russell rushed out of the clinic when they were done — he said he went outside to throw up — and came back 10 minutes later. By then, Ropson said, the sergeant was “even more stressed and uncomfortable than when he arrived.”<sup>5</sup>*
- *University of Pennsylvania forensic psychiatrist Robert Sadoff wrote for the defense: “I can say, very clearly, that I have never seen a case such as this one, where the defendant was provoked to violence by the ineptitude and lack of compassion of two of my colleagues.”<sup>6</sup>*
- *Fernbach, the Camp Stryker psychologist, declined to be interviewed. “We all did the best we could regarding this case,” she said in a voice-mail message.<sup>7</sup>*

## Conclusion

This complaint has clearly established Dr. Fernbach's pattern and practice of dehumanizing conduct and failures to uphold ethical and professional obligations, which in many instances has

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<sup>3</sup> Associated Press. “Soldier's mental health debated in Iraq shootings.” August 10, 2011.

<https://www.foxnews.com/us/soldiers-mental-health-debated-in-iraq-shootings.amp>

<sup>4</sup> Murphy, Kim. “Did the system fail a soldier?” *Los Angeles Times*. April 15, 2013.

<https://www.latimes.com/nation/la-xpm-2013-apr-15-la-na-russell-court-martial-20130415-story.html>

<sup>5</sup> Smith, Elliot Blair. “Mental health crisis exposed with Camp Liberty killings.” *Bloomberg News*. August 29, 2012.

[https://kdhnews.com/fort\\_hood\\_herald/homefront/mental-health-crisis-exposed-with-camp-liberty-killings/article\\_63215af6-f18c-11e1-956e-0019bb30f31a.html](https://kdhnews.com/fort_hood_herald/homefront/mental-health-crisis-exposed-with-camp-liberty-killings/article_63215af6-f18c-11e1-956e-0019bb30f31a.html)

<sup>6</sup> Murphy, Kim. “Did the system fail a soldier?” *Los Angeles Times*. April 15, 2013.

<https://www.latimes.com/nation/la-xpm-2013-apr-15-la-na-russell-court-martial-20130415-story.html>

<sup>7</sup> Smith, Elliot Blair. “Mental health crisis exposed with Camp Liberty killings.” *Bloomberg News*. August 29, 2012.

[https://kdhnews.com/fort\\_hood\\_herald/homefront/mental-health-crisis-exposed-with-camp-liberty-killings/article\\_63215af6-f18c-11e1-956e-0019bb30f31a.html](https://kdhnews.com/fort_hood_herald/homefront/mental-health-crisis-exposed-with-camp-liberty-killings/article_63215af6-f18c-11e1-956e-0019bb30f31a.html)

further harmed highly traumatized individuals who acknowledged their risk for harm to themselves or others due to mental illness. Now informed of such egregious and ongoing misconduct, it is the role of the BOP and other authorities to take action to prevent further harm.

On August 11, 2021, a broad coalition of more than 50 immigrant rights organizations called on California state officials to take proactive steps to address the health and safety of immigrants in detention facilities across California.<sup>8</sup> In a letter addressed to Governor Gavin Newsom and Attorney General Rob Bonta, the organizations stated unequivocally that, “*we believe that the state of California can and should do more to protect the lives of those detained in immigrant detention facilities in our state.*”<sup>9</sup>

Notably, in 2017, the California Legislature enacted Assembly Bill 103, requiring the Department of Justice (DOJ) to review and report on immigration detention facilities in response to growing concerns regarding conditions in facilities in California. In January 2021, then-Attorney General Xavier Becerra published the second annual report which included an extensive review of Otay Mesa.<sup>10</sup> One of the key findings of the DOJ’s review of Otay Mesa was that the “provision of mental health services below the community standard of care results in self-harm, psychiatric hospitalizations, and the prolonged isolation and suffering of some of Otay Mesa’s most vulnerable detainees.”<sup>11</sup>

Unfortunately, simply documenting this level of mistreatment without taking any action to address it is wholly inadequate and unethical on behalf of the DOJ. This is a prime example of a particular situation in which California state agencies clearly have the proper authority to intervene and mitigate the harm caused by unethical and unprofessional detention staff.

In solidarity with Ibrahim, Hugo, Artemio, Elenilson, Oscar, Erik, Sulieto, Sergio, Junior, Fernando, Israel, R.R., and the countless others who have suffered devastating psychological harms in moments of extreme vulnerability, we request that you please investigate the mental health service provision at Otay Mesa and in particular the mistreatment conducted by Dr. Fernbach.

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<sup>8</sup> California Collaborative for Immigrant Justice. “Immigrant Detention in California: Opportunities for Accountability.” August 16, 2021. <http://ccijjustice.org/ca-detention-conditions-report>

<sup>9</sup> California Collaborative for Immigrant Justice. “Immigrant Detention in California: Opportunities for Accountability.” August 16, 2021. <http://ccijjustice.org/ca-detention-conditions-report>

<sup>10</sup> State of California Department of Justice. “Attorney General Becerra Releases Second Report on Immigration Detention Facilities in California.” January 19, 2021.

<https://oag.ca.gov/news/press-releases/attorney-general-becerra-releases-second-report-immigration-detention-facilities>

<sup>11</sup> State of California Department of Justice. “The California Department of Justice’s Review of Immigration Detention in California.” January 2021. p. 98

<https://oag.ca.gov/sites/all/files/agweb/pdfs/publications/immigration-detention-2021.pdf>

Sincerely,

Al Otro Lado

American Friends Service Committee - San Diego

Civil Rights Education and Enforcement Center

Detention Resistance

Freedom for Immigrants

Free Them All San Diego

Party for Socialism and Liberation - San Diego

SOLACE (Souls Offering Loving And Compassionate Ears) Interfaith Detention Center

Visitation Project of the First Unitarian Universalist Church of San Diego

Tahrir Liberation Community Law: Law Office of Lillian Boctor