

EXHIBIT

11

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Ángel Alejandro HEREDIA MONS et al.)
)
 Plaintiffs,)
)
 v.)
)
 Kevin K. McALEENAN et al.)
)
 Defendants/Respondents.)
)

Civ. No.: 1:19-cv-01593

DECLARATION OF DR. PETER SCHARF

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I. Overview"

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III. Case Issues"

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IV. Factual and Evidentiary Basis for Expert Declaration"

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⁵Hannah Gaber, *Under Trump, private prisons are cashing in on ICE detainees.* "WUC"VQFC["*Fge0"42."
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V. Expert Opinions

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B. Second Opinion: The characteristics of the detention centers present a risk of serious illness and death from the contraction and transmission of COVID-19, including the fact that Louisiana has the highest rate per capita of infections, and that the populations inside these facilities have a heightened risk due to the density of population, heavy use, and unsanitary conditions. In addition, staff and in some situations, newly detained persons, who have been outside of the detention center, may serve as vectors for spreading the virus to the existing detained population who have limited ability to take necessary precautions. "
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C. Third Opinion: Contract detention center management and ICE-run detention facilities do not have the adequate medical care and cannot ensure reasonable safety, to the detained population, resulting in an increased vulnerability to COVID-19 impacts. In addition, detained persons with underlying chronic conditions who experience an even greater risk of the consequences of COVID-19 are not segmented from the rest of the detained population. ""
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⁴³"See"hqqvppvg":."supra0"

⁴⁴"Mgplk"Ok|woqvq"cv"cn0."Estimating the asymptomatic proportion of coronavirus disease 2019 (COVID-19) cases on board the Diamond Cruise ship, Yokohama, Japan"*4242+."cxckncdng"cv<"
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520 Htq"o"vjg"kpht"ocvkqp"cpf"fqew"ogpvu"vjcv"K"jcxg"tgxkygf."vjg"Pg y"Qtngcpu"Hkgnf"Qhhkeg"
fqgu"pqv"errgct"vq"jcxg"ko"rng"ogpvfg"c"rtqvdeqn"vq"fgcn"ykvj"vjg"EQXKF/3;"rcpfg"oke⁰"

⁴⁵"Ugg"jwru"lly"y"okeg"iqlf"fgvgpvkqp/uvcpfctful4233"cwO

D. Fourth Opinion: There are foreseeable risks in terms of further outbreak and negative health impacts of COVID-19 on the detained population, unless efforts to release people are immediately undertaken."

530 Vjg" dguv" grkfgokqnqikecn" oqfgnu" cxckncdng." dcugf" qp" xcnkf"uekgrpvhke" tgugctej." uwi iguv"
ykgfurtgcf"EQXKF/3;"eqpvcikqp"kp"vjku"tgikqpøu"KEG"hceknkvkgu." yjkej" yknn"ngcf"vq"dtqcf"
eqpvcikqp"wpnguu"tgngcug"ghhqtvu"ctg"kpkykcvgf"kp"c"tcrkf"vkoghtcog0"

and death, is in my opinion substantial and avoidable if appropriate release mechanisms are adopted in a rapid timeframe.

Rwtuwcpv"vq"4:"W0U0E0"3968."K"fgentg"wpfgt"rgpcnv{"qh"rgtlwt{"vjcv"vjg"hqtgiqkpi"ku"vtwg"
cpf"eqttgev0"

Gzgewvgf"qp"vjkua4;"j"fc{"qh"Otej"cv"Pg y"Qtngcpu."Nqwkukcpc."Wpkvgf"Uvcvgu0"

"


aaa"
Ft0"Rgvt"Uejcth"
Nqwkukcpc"Uvcvg"Wpkxgtukv{"Jgcnvj"Uekgpegu"Egpgvt"
4242" I tckgt"Uvtggv."5^{tf}"Hnqqt"
Pg y"Qtngcpu."Nqwkukcpc"
[ruejctBnuwjue0gfw](#)"
*726+"72;/;:22"



" Ft0"Uejcthv"v"gvkkgf"hw"vko"gdhgtg"vjg"Jqwug"Lwfkekt{"Eqo"okvvgg"tgictfkpi"o"wtfgt"vtgpfu"cpf"yqtmgf"ykvj"Uvwctv"Dcmgt"qh"vjg"Yjkgv"Jqwug"qp"cp"cuuguu"ogpv"qh"vjg"hgfgtcn" Tgurqpug"vq"Jwttkecpg"Mcvtkpc0""

Jg"ku"vjg"cwvjqt"qh"ugxgtcn"dqqmu."kpenwfkpi" *Readings in Moral Education*""

*3;9:+." *Growing Up Moral*"*3;9;+." *Towards a Just Correctional System*"*3;:2+.""

Badge and the Bullet"*3;:5+." *A Guide to Computer-Age Parenting (1984)*, "

Understanding the Computer-Age"*3;: :+." *Law Enforcement Integrity: The state of the art (2006), and the Justice Information Sharing Performance Measures Guide*"*422:+."gcej"qh"y"jkej"jcu"jcf"

c"uvtqpi"ko"rcev"qp"gfwevcqpcn."rwdnke"jgcnvj"cpf"etko"kpcn"lwuvkeg"rtcevkeg0""

Jg"jcu"cr"rgctgf"kp"cpw"odgt"qh"pcvkqpcn"ogfkc"gpvkkgu"kp"vjg"rcuv"hxg{"gctu"kpenwfkpi" PRT"*8+."

NBC Evening News"*5+."RDU"*5+." *Nightline*."DDE"*4+ "cpf"EP P"*5+ "cpf"jcu"dggp"kpvgtxkygf"d{"vjg"

Pgy" [qtm"Vko"gu"*6+." Ycu"jkip"vqp"Rquv"*4+."cpf"Ycnn"Uvtggv"Lqwtpcn." Jqwuvqp"Ej"tqpkeng"*4+."WUC"

Vqfc{"*8+ "cpf"qvjgt"pcvkqpcn"pgyu"gpvkkgu0" Jg"ycu"dqvj"vtgcuwtgt"cpf"ugetgvct{"qh"vjg"HDK"Ekvk | gpøu"

Cecfgo {"Cnw"opk"Cuqekcvkqp"ukpeg"42260" Jg"ycu"cumgf"vq"v"gvkkgf"hw"vko"gdhgtg"vjg"Jqwug"qh"

Tgrtgugpvcvxgu"*7132129-"8146134."3145135"cpf"91441370+""

"" Jg"tgegpvn{"ycu"pcogf"chceknkvcvt"cpf"cpcn{uv" hqt"vjg" Rwdnk

Professional Experience: "
University Employment "

É 3;98/3; :2<" *CBS Publishing*: Ceswkukvkqpu"Gfkvqt."Vtcfg"cpf"Gfwecvkqp"Vkvngu<"Ceswktgf"
jwo cp"fgxgnqr o gpv."etk o kpcn."gfwecvkqp"lwuvkeg"cpf"vtcfg"dqqm" o cpwuetkrvu0"

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É 4225/4227<"Sierra Systems<"Eqpuwnvcpv" hqt" Etk o kpcn" Lwuvkeg" Rtqi tc o u0""

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É 4225<"FBI Citizen's Academy Alumni Association<"Ugetgvct{."Vtgcuwgtg."Dqctf"Og o dgt0""

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É 4226< Achieve3000<" Ewttkewnwo" Uwdlgev" Ocvvgt" Gzrgtv" hqt" qp/nkpg" o qtcn" ewttkewnwo" fgxgnqr o gpv0""

""

É 4226/4229< International Association of Chiefs of Police"Community Policing"Eqpuwnvcpv<" UOCTV"Rtqi tc o /Lwxgpkng"Ugtxkegu"Rtqi tc o 0""

""

É 4227/4228<"White House (Stuart Baker):" Cuuguu o gpv" qh" hgfgtcn" tguqqug" vq" J wttkecpg" Mcvtkpc0""

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É 4229/4234<"

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Academic Appointments: "

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3;95"vq"3; :3""

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University of California at Irvine""

Cuukuvcpv"Rtqhguuqt"qh"Uqekcn"
Geqni { ""

""

3; :4"vq"3; :8""

"

Seattle University

Cuuqekcvg"Rtqhguuqt"qh""

....."Uqekqni { ""

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3; :8"vq"3; ::"

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University of Pennsylvania

Hcewnv { "Og o dgt"kp"Eq o rwtg"
GfwecvkqplEtk o kpcn"Lwuvkeg""

""

3; :;"vq"3; ;4""

City University""

Hcewnv { "Og o dgt"kp"Gfwecvkqp."""

Dwukpguu"cpf"Etk o kpcn"Lwuvkeg""

""

3; ;6/3; ;7""

American University."Uqekgv { ""

Cpf"Lwuvkeg"Rtqi tco""

Cflwpev"Rtqhguuqt"Ncy"cpf"Lwuvkeg"
Rtqi tco""

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3; ;7/4229""

University of New Orleans""

Cuuqekcvg"Rtqhguuqt."Fktgevqt"EUNL"

Fgrctv o gpv"qh"Uqekqni { ""

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4228/422:"

Texas State University.""

Tgugcte j "Rtqhguuqt."""

Etk o kpcn"Lwuvkeg."Hqwpfcvkqpu"qh"
Gzegngpeg"Cyctf""

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422:/4236

Tulane University "

*School of Public Health and
Tropical Medicine, Global Health
Systems and Development*

Department "

Tgugcte j "Rtqhguuqt"qh"

Rwdnke" J gcnvj. ""

Ugetgvct{ "vq"Hcewnv{"Ugpcvg"*4232/
4233+""

Qwwwcpfkpi"Wpfgti tcfwcyg"Vgcejgt"

Selected Journal Titles "

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Technical Reports, Published Presentations, Training Research, Policy Publications "

""

Rules: Interdisciplinary module Biological Sciences Curriculum Study; : 4+0"
Police Use of Deadly Force-UC Irvine; : 4+0"

\$Ujqqv\Fqpøv"Ujqqvö"JDQ"Xkfgq/FDC; : 6+0"

Creating a Correctional Just Community/ Jctxctf"W; : 7+0"

NO Macarthur Jail Reduction Manuscript "4237+ "NUW"Uejqqn"qh"Rwdnke" J gcnvj "4237+0" , ""

Raise the Age: a report to the LA Legislaturg "ykvj" Ft0"Uvgr jgp"Rjknkr rk."gv0"cn0"
*4238+." , ""

Education and Violent Crime."Gfwecvkqpcn"Vguvki"Ugtxkeg"*4239+0" , ""

Briefings to Mayor Elect Cantrell Transition Team."*423 : +0" *Facilitation of City in Crisis
Opioid Forum*"NUW JUE"*423 ; +"

The Costs and Consequences of Gun Violence,"Wpkxgtukv { "qh"Cncdc oc"Ogfkecn"Uejqqn"
*423 ; +""

, Cxckncdng"vj tqw i j" [y y y0eunl0pgv=" y y y0pkeke0qti" y y y0qlr0qti](#) "qt"vj tqw i j" Iqqing""

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Recent Selected Expert Witness Activity





KLKU"Kpukvwvg"öVgejpnqi {"cpf"Qti cpk|cvkqpcn"Ej cpi gö" Fwnggu."XC"*4227+""
PELC"öRgthqt o cpeg"Dcugf"Etk o kpcn"Lwuvkegö." Fcpc"Rqkpv."EC"*4227+""
UGCTE J"öQti cpk|cvkqpcn"Rgturgevkgu"cpf"Ceeqwpvcdkkv{." Ycujkpi vqp."FE"*4228+""
PELCIKLU"Kpukvwvg"öRgthqt o cpeg"Ogcwgtgu."Dcnvk o qtg."OF"*4228+""
PCKLU"öEj cpi g"cpf"Rgthqt o cpeg"Ogcwgtguö"Dqec"Tvqp"HNC"*4228+""
CEC/PL"öGxcwcvkqp"qh"Qtngcpu"Rctkuj"Rtkuqp"fwtkpi"Jwtkcpg"Mcvtkpcö"Cvncpvke"Ekv{."PL"
*4228+""
Rtqlgev"Kpm y gnn"öGfwecvqk"cpf"Etk o gö"Ugcwng."YC"*4228+""
I gqt i g" Ycujkpi vqp"Wpkxgtukv{ö"Vgejpnqi {"cpf"Owftgtö"Cujdwtp."XC"*4229+""
KLKU"Kpukvwvg|PELC"öOwftgt"Vtgpfuö"Rjqgpkz."C\"*4229+""
KKLU"öRgthqt o cpeg"Ogvtkeu"cpf"Xkqngpv"Etk o gö"Urtkpi hkgnf."Knn0"*4229+"WU" Jqwug"qh"
Tgrtgugpvcvkgu"Lwfkekt{"Eq o o kvvgg"öGctn{"Kpvgtxgpvkqpu"tg<" o cpc i kpi "xkqngpv"etk o g"
tkumuö"PQNC"*4229+""
WU" Jqwug"qh"Tgrtgugpvcvkgu"Lwfkekt{"Eq o o kvvgg"öY jcv"Y qtmul Y jcv" Fqgu" PqvA"
Tg<"eqpvtqn"qh"xkqngpv"etk o gö" Ycujkpi vqp."FE"*4229+""
Cmkepeg"hqf" Iqqf" Iqxgtp o gpv"öOwftgt"kp" Pgy "Qtngcpuö" Pgy "Qtngcpu."NC"*4229+""
K CER"öOwftgt"cpf"vjg"Ogfk."Pgy"Qtngcpu."NC"*4229+""
DLC"öKphqt o cvkqp"Ujctkpi"Uw o o kvö" Ycujkpi vqp."FE"*422: +""
Pqdg n"Rwdnke"Ugtxkeg"Rtgugpvcvqk"öEtk o g"cpf"vjg"Mpqyngfig"Geppq o {"ö"Uvqemj qn o "Uy gfgp"
*422: +""
Eqttgevqkpu"Vgejpnqi {"Cuuqekcvk

- Hqz"VX"
- CDE"Pki jvknpg"

- Dwtgcw"qh"Lwuvkeg"Cuukuvcepeg."öCtv"qh"KV"Rgthqt o cpeg"Ogcuwtkuö"&372.222" *4228/;+"
- Qhhkeg"qh" Fq o guvke"Rtgrctgfpguu"WUCC/PKOUl Y OF"Vtckpki " ö&822.222022"*4227/32+"
- Dwtgcw"qh"Lwuvkeg"Cuukuvcepeg"RTGC"öTkum"Cuuguu o gpvö/" &749.222022"*4228/9+"
- Dwtgcw"qh"Lwuvkeg"Cuukuvcepeg"RTGC"öEj cpi g"Gz rgtk o gpvö/" &;72.222022*4229/;+"
- Dwtgcw"qh"Lwuvkeg"Cuukuvcepeg/Cuuguu o gpv"qh"Rg i cuwu"Nqecn"vq"" Nqecn"Uj ctkpi "Kpkvkcvxg"/&5.722.222022"*vqvcn+" ykvj "Rg i cuwu"" Tgugcte j "Hqwpfcvkqp."Rj cug"3"cpf"4"<*"422;/33+"
- Tgeqxtg{"Uejqqn" Fkuvtkev." Fguk i pki "cp" Cnvgtpcvkxg"Uejqqn" hqt" J k i j "Tkum" Uvwfgpvu"*4234/5+"
- Dwtgcw"qh"Lwuvkeg"Cuukuvcepeg/Cuuguu o gpv"qh"DLC"Eq/Qeewttkpi " Fkuqtfgt" Kpkvkcvxg" ykvj "NC" FQE/&862.222/"4233/4236""
- Dwtgcw"qh"Lwuvkeg"Cuukuvcepeg/Uvcvg y kfg" Tgekfkxku o "Tgfwevkqp/" Ykvj "NC" FQE."&" ; : 4.222022/4234/36""
- Dwtgcw"qh"Lwuvkeg"Cuukuvcepeg/Uvcvg y kfg" Tg/Gpvt{"K o rng o gpvcvkqp/" Ykvj "NC" FQE."&"922.222022/4237/39""
- Dwtgcw"qh"Lwuvkeg"Cuukuvcepeg/"Rj cug"KK"Cuuguu o gpv"qh"DLC"Eq/Qeewttkpi " Fkuqtfgt"Kpkvkcvxg" ykvj "NC" FQE/&862.222/"4236/4239" Ykppgt"qh"CEC" kppqxcvkqp"cyctf"*4239+"
- Oce"Ctvj wt"Hqwpfcvkqp/Cuuguu o gpv"qh"Lckn" Tgfwevkqp"Kpkvkcvxg"&65.222022" *4238/;+"
- I tgvpc"Rqnkeg" Fgrctv o gpv/Tceg" Tgncvkqpu"cpf"Uqekcn" O g fkc"*423;+"

Personal: "

""""""""Hcvjgt"qh"Cftkc."Uci g."Tc|k"cpf"Vguuc0""

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I tcpfhcvjgt"qh"Ucjctc."Qygp."Ngxk."Ugfgpc."Fgpk."Jcpccj"Eqtc."cpf"Ognkc0""