

transferred to the Tallahatchie County Correctional Facility (Tallahatchie) in Tutwiler, Mississippi.

Impediments to Parole Access

5. At Tallahatchie I was given a credible fear interview in early December 2019. Over a week later, ICE determined me credible and provided me with a parole advisal in English that said I had only two days to submit documents in support of a request. Officers at Tallahatchie told me that, even if I submitted documents by the due date, I had no chance

14. I asked an ICE agent, who is Puerto Rican, why I was not receiving any response to my parole request. He told me, _____ th that rule her He said that only people who are sick or pregnant will get parole. He told me just to forget about parole. When we ask ICE officers for their names here, they refused to tell us.
15. In or about early April 2020, I still had received no response to my parole request, and I had never received an interview or even a parole advisal as a receipt of my submitted parole request. I began to work with my family and a volunteer who offered to help me gather new evidence for another parole request.
16. My new request included all required documentation to prove my identity and that I am not a flight risk or a danger to the community. It also included the parole documents for my intimate partner and ultrasounds showing the status of her pregnancy. My sponsor submitted the parole request on April 7, 2020 via email to Diane Witte, John Hartnett, Joey

Fear of Continued Detention and Plans if Released on Parole

18. I am very disillusioned and distraught over the way ICE has handled my case. We are supposedly in their custody, but it is clear to me they do not care about us or respect our humanity. It is very important to me that I am with my partner when she gives birth to our daughter, who is due in just about a month. I do not want my daughter to grow up without a father, and my partner desperately needs my support.

19. I have done everything in my power to comply with the laws of the US by waiting to present myself to immigration officials at a port of entry and showing up prepared at my court hearings. I intend to continue to do just that, and I have a Lawful Permanent Resident sponsor who has assured the government that she will provide for me financially and provide me transportation to all future ICE check-ins and court hearings if I am released. Additionally, ICE has not taken into consideration that I would be able to seek additional relief from removal by applying for a green card under the Cuban Adjustment Act a year after my release on parole. There is no reason for me to remain detained here.

20. Especially now with the threat of COVID-19, I am scared for my yehatef [E]7(s)62(for)-62(m)7()-re

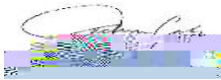
21. I now anxiously await a parole decision, and another court hearing on May 14, 2020, which I expect to face alone. I have not been able to secure representation from this remote detention center. If I am released, I plan to self-partner until our child is born.

CERTIFICATION

I, Jaclyn Cole, declare that I am proficient in the English and Spanish languages. On April 28, 2020, I read the foregoing declaration and orally translated it faithfully and accurately into Spanish over a telephonic call with the declarant. After I completed translating the declaration, the declarant verified that the contents of the foregoing declaration are true and accurate.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2020

A handwritten signature in black ink, appearing to read 'Jaclyn Cole', is written over a horizontal line. The signature is somewhat stylized and includes a large loop at the beginning.

Signature

VERIFICATION

I, [REDACTED], am the individual referred to as C.L.H. in the attached declaration. I declare under penalty of perjury that the foregoing is true and correct.

I have authorized a legal agent for Plaintiffs in the *Heredia Mons* litigation to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. I am also foregoing the option to sign documents sent by mail due to the urgency of the COVID-19 situation and due to reasonable fear of destruction of mail or retaliation. (G)TJETQq