

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Ángel Alejandro Heredia Mons et al.

Plaintiffs,
v.

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

10. Before I had my final hearing with Immigration Judge Landis, I wrote a letter asking to postpone my hearing because I was in severe pain from the cyst and was worried about doing my hearing while I was in so much pain. However, he ignored my letter, and when I asked during the hearing, he denied my request. He also denied my request for more time to find an attorney, so I proceeded without one.
11. The judge denied my case because he said he did not believe me, as there were inconsistencies between my credible fear interview and my testimony. But the judge only asked me yes or no questions during the hearing, so I could not properly explain my story. He also ignored the evidence I presented, including affidavits and country conditions reports. I appealed this decision on April 7, 2020, and it remains pending.
12. In the month of February 2020, my dorm H-B was under quarantine for approximately one month because of the flu. Lots of people were coughing and many people were taken to the medical unit. No one was allowed to leave the dorm and we only had recreational time with people in our unit. Eventually this quarantine was lifted about 6 weeks ago.
13. After my first parole denial in Tallahatchie, I applied again while detained at the River Correctional Center on or about November 27, 2019. I included documentation from my sponsor including a letter of support, identification and his tax returns. A week later, I had a brief interview with ICE and they asked questions about whether I had a sponsor (I stated I did), if I had money in my account (I stated I did), what mode of transport I would use get to my sponsor (I stated by bus), if I had money to pay for a bus ticket (I stated I did), and if I had community ties (I explained that I am Catholic and would attend my aunt and uncle's church as they're Catholic too). The ICE officer said they will get back to me. However, I never got a response.

14. After about a month without any response, I made a request on a sheet of paper to ICE asking about the decision on my parole. ICE wrote back on the same sheet that my parole was denied, but there was no explanation as to why. I didn't receive any other documentation indicating why my parole was denied. I was transferred from River Correctional Center on or around January 27, 2020, to LaSalle ICE Processing Center in Jena, Louisiana.
15. I applied for parole again sometime in February 2020. Since then I have not received any reply or decision. I wrote to ICE on the tablet in my dorm asking why I hadn't yet received a reply and was told that my ICE deportation officer is in River, so I would need to write to him to find out what was going on with my parole application. However, I don't know my deportation officer's name and was never given any contact information for him. As such, it was impossible for me to contact him. That is the only response I've gotten from anyone here in Jena.
16. There are about 86 people in my dorm. Our beds are very close to each other, just a few millimeters apart. We have a total of six toilets, but only three of them are currently working. We have seven showers for all 86 of us, all of them have some water flow, but only four showers work properly. For the other three, the water pressure is too weak and doesn't last long enough to be able to take a shower. When I first arrived at LaSalle there was hand soap on the wall. A few weeks ago, this started to run out in the middle of the day. Now, they gave each person an individual bottle of universal soap to be used for hand washing, bathing and shampoo. We get a new bottle every Monday, so we have to make the bottle last the whole week.

17. Starting last Wednesday, April 22nd, everyone was given masks, but not everyone wears them. The other detainees don't think it matters if we wear them because everyone is mixed with each other and think we've already been exposed, so most people don't wear them. We get gloves only when we want to clean the dorm. The officers have access to masks, but they also don't always wear them. They're supposed to wear masks when they enter our dorms, but most officials don't respect the rules. As for gloves, sometimes the officers wear them and sometimes they don't. They're not consistent about wearing gloves but they are touching a lot of communal things such as the phones to make sure they're working, or the television remote.
18. More and more people are developing symptoms, like cough, sneezing, and fever. Our dorm is under quarantine; three out of the four dorms in my unit, Hawk, are quarantined. The officers have been short-staffed. There are two officers taking care of four dorms in one unit. Normally we have four officers for one unit; one officer per dorm. I also see completely new faces. They also don't sit inside the dorms like they used to, they sit outside in the hallway and look through the glass. Normally an officer sits in the dorm at their station the whole day.

Plans if Released on Parole

20. If I am released on parole, I will live with my US citizen uncle in Frederick, Maryland.

My uncle will provide ongoing housing for me, financial support and support for my immigration case. My US citizen cousin has also offered to provide me whatever support I need upon my release. My family in Maryland is very supportive of me. I have already secured representation for my appeal to the Board of Immigration Appeals. I plan to self-quarantine in my uncle's home to keep myself and others safe from COVID-19.

DECLARATION OF D.A.A.

I, [REDACTED], am the individual referred to as D.A.A. in the attached declaration. I declare under penalty of perjury under the laws of the United States of America 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 by officials at this facility. If required to do so, I will provide a signature when I am able.



Michelle P. Gonzalez, Esq.
On behalf of class member [REDACTED]

Date: April 30, 2020