

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

Ángel Alejandro Heredia Mons et al.)

Plaintiffs,)

v.)

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

Kevin K. McALEENAN et al.)

Defendants/Respondents.)

DECLARATION OF Y.C.F.

I, Y.C.F., declare under penalty of perjury that the following is true and correct to the best of my knowledge:

Biographical Information

1. My

Impediments to Parole Access

3. On or about

ICE was now taking the September 5th order from the Judge in Washington D.C. seriously.

I added more evidence to my original parole packet including new letters of support.

8. A few days later, I was interviewed in person by Officer Zapia. This is very rare here.

Usually the DOs just have women fill out a form, and they

vitamins. Once in Cuba I required a blood transfusion due to my condition which was causing me chronic dizziness and tachycardia. Here I have no access to the different vitamins I need. I buy myself Vitamin C at the commissary when it is available.

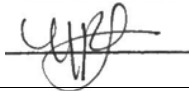
15. Sometimes my blood pressure goes up too high from the stress of being in here and I get very flushed in the face. I also experience severe anxiety because the DOs refuse to tell me what I need to provide for ICE so that they will no longer consider me to be a flight risk. I understand that my proposed sponsor is not an immediate relative, but one of the first women they granted parole to from this jail was to a woman who used her longtime boyfriend as her sponsor. Others have been released with an uncle or cousin as their sponsor, but now some DOs tell us it has to be an immediate family member. The decisions and p

CERTIFICATION

I, Michelle P. Gonzalez, declare that I am proficient in the English and Spanish languages. On April 21, 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 21, 2020

A handwritten signature in black ink, appearing to be 'MPG', written over a horizontal line.

Signature

VERIFICATION

I, [REDACTED], am the individual referred to as Y.C.F. 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 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 witness [REDACTED]

Date: April 21, 2020