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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION**

**RAUL NOVOA, JAIME CAMPOS
FUENTES, ABDIAZIZ KARIM,
AND RAMON MANCIA**, individually
and on behalf of all others similarly
situated,

Plaintiffs,

v.

THE GEO GROUP, INC.,
Defendant.

Civil Action No. 5:17-cv-02514-JGB-SHKx

**DECLARATION OF DANIEL H.
CHAREST IN SUPPORT OF
PLAINTIFFS' EX PARTE
APPLICATION FOR A
TEMPORARY RESTRAINING
ORDER REQUIRING COVID-19
PREVENTION MEASURES FOR
NATIONWIDE HUSP CLASS**

DECLARATION OF DANIEL H. CHAREST IN
SUPPORT OF PLAINTIFFS' EX PARTE APPLICATION
FOR A TEMPORARY RESTRAINING ORDER
REQUIRING COVID-19 PREVENTION MEASURES
FOR NATIONWIDE HUSP CLASS

5:17-cv-02514-JGB

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1 I, Daniel H. Charest, declare that the following is true and correct to the best of
2 my knowledge:

3
4 1. My name is Daniel H. Charest. I am a partner at Burns Charest, LLP,
5 located at 900 Jackson Street, Suite 500, Dallas, Texas 75202.

6 2. My office represents Raul Novoa, Jaime Campos Fuentes, Abdiaziz Karim,
7
8 Ramon Mancia, and the certified class in this case.

9 3. Attached to this Declaration are true and correct copies of the following
10 documents:

11 **Exhibit A:** A true and correct copy of the declaration of Griselda Del Bosque (“Del
12 Bosque Decl.”) filed in *Dada, et al. v. Witte et al.*, Civil Action No. 02-20-cv-
13 01093, ECF No. 5 (E.D. La.) filed Apr. 1, 2020, retrieved from PACER.

14 **Exhibit B:** A true and correct copy of the declaration of Sonia Lemus Tejada Dejaso
15 (“Tejada Dejaso Decl.”) filed in *Dada, et al. v. Witte et al.*, Civil Action No.
16 02-20-cv-01093, ECF No. 2-19 (E.D. La.) filed Apr. 1, 2020 retrieved from
PACER.

17 **Exhibit C:** Declaration of Abby Frazer (“Frazer Decl.”) (describing GEO’s Denver
18 Contract Detention Facility in Aurora, Colorado).

19 **Exhibit D:** A true and my correct copy of the declaration of Mariel Villarreal filed in
20 *Dada, et al. v. Witte et al.*, Civil Action No. 02-20-cv-01093, ECF No. 2-32
21 (E.D. La.) filed Apr. 1, 2020 retrieved from PACER.

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

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/s/ Daniel H. Charest

April 6, 2020

Daniel H. Charest (admitted *pro hac vice*)

DATE

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EXHIBIT A

Declaration of Griselda Del Bosque

I, Griselda Del Bosque, declare as follows:

1. My name is Griselda Del Bosque. I am 57 years old and a Mexican citizen. I am currently detained at LaSalle ICE Processing Center in Jena, Louisiana.
2. I am an asthmatic. The inhaler I was given in this facility controls the asthma a little but not all the way. I wake up every morning unable to breath, the vapor and humidity in the prison affect my lungs a lot and I've had a cough since I got here three months ago. When I walk, laugh, sit, I get asthma attacks.
3. I have many other health issues including glaucoma in my eyes; I was told a year ago that if I didn't get treatment I could go blind. I can't feel one of my arms, have disk issues in my back and knee problems that make it hard to walk. I only get treatment for my asthma and Tylenol for the pain in my body.
4. I've been able to see the doctor twice, the last time was on March 24th because I haven't been feeling well. They told me my heart was racing and said maybe it was because of stress but didn't give me any other information.
5. Very little has changed in the facility to address the virus. Some of the guards walk around with masks, not all, and I haven't seen any of them wear gloves, not even the medical staff. A guard told us that with or without the virus they will keep picking people up, having court, and deporting people. A nurse said to us she didn't understand why they kept bringing people here, and that we're all being put at risk by bringing new people all the time.
6. The only instruction we've received about the virus is to wash our hands and stay at a distance, which made us mad because how can we do that with how close the beds are—less than a foot in between. We tried putting towels between the beds to make a barrier but the guards forced us to take them down.
7. We still sometimes don't have soap or toilet paper for several days if it's not replaced. We were told by a guard that the soap we are given in the bathrooms is for hands and body only but that it's not disinfecting.
8. I am confined to dorm Alpha D, with 80 other women. It is one big room where we all sleep, eat, and bathe, and we all share three bathrooms, six showers, and eight or nine phones. One month ago the water got turned off and we couldn't clean anything for days. The prisoners are the ones who do the cleanings in the dorms, there are some who are paid to do it \$1 a day, but we also volunteer to help. We clean what we can with what they give us, usually we just have to use soap and water. Yesterday they brought us this liquid to clean the tables. With one towel we're supposed to clean everything, the phone, the tables, the bathrooms.

9. There are some very sick women here. There was one who couldn't breathe, another who has cancer and was passing out because of the pain. Two women in another dorm were removed and put into the solitary confinement cells because they had a cough and fever. I don't know what has happened to those two women. Six or seven new women arrived Thursday night, and they're being put in with everyone else.
10. If I was released I would stay with my daughter Cristal Del Bosque, at 507 Fairview Road, Dallas, TX 75223.
11. I have authorized my attorney to sign on my behalf, given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge.



Jeremy Jong signing on behalf of Griselda Del Bosque

Date: 03/27/2020

EXHIBIT B

Declaration of Sonia Lemus Tejada Dejaso

I, Sonia Lemus Tejada Dejaso, declare as follows:

1. My name is Sonia Lemus Tejada Dejaso. I am 53 years old and a Guatemalan citizen. I am currently detained at LaSalle ICE Processing Center in Jena, Louisiana.
2. If I were released I would live with my son Miguel Angel Sanchez at 15812 Orange Dr., Edinburg, TX, 78541.
3. I have a history of heart issues. In the decades I lived in Texas before my detention, I often had to go to the hospital for various heart problems.
4. I currently suffer from hypertension and take medications daily in an attempt to control my blood pressure.
5. Because of my heart and blood pressure issues, I have major problems sleeping. I regularly have pain in my head and my chest. When I go to the medical unit, they only give me Tylenol for pain.
6. About four or five weeks ago, I was taken to the emergency room at Lasalle General Hospital when I wasn't able to breathe and started feeling numbness in parts of my body. The doctors at the hospital never told me what was wrong with me. I still have residual pain in the left side of my back since that day.
7. At LaSalle, I am housed in Falcon-D dorm. The dorm has enough beds for 80 people and we have been at capacity for a long time. People are transferred in and out all the time. In the past two weeks, ICE has brought in about 15 new detainees to the dorm as other people have left.
8. We've been at capacity for a long time and still people are transferred in all the time. In the past two weeks, ICE has brought in about 15 new detainees to the dorm as people have left.
9. Conditions in our dorm are unsanitary. We don't have any sinks to clean our bowls, so people clean their bowls in the bathrooms. I work cleaning the showers in my dorm for one dollar a day. I am not given any masks. Sometimes I run out of cleaning supplies and have to wash the floor of the showers with shampoo. The showers are only cleaned twice a day.
10. Three days ago, LaSalle staff came to talk to us about coronavirus. We had questions for them, such as asking what they were doing to ensure that staff stayed away from us so that they would not give us coronavirus. But staff were very dismissive of us and shushed our questions.

11. After they left, the officials went to the next dorm over to do the same presentation. Shortly afterwards, I was looking out the window of the dorm when I saw detained people coming out of that dorm, Falcon-C, choking and gasping for air. When people were leaving the dorm choking, I saw one of the guards choking as well.
12. Then, gas from the other dorm started seeping into our dorm. Our eyes started burning. Some of us that were closer to the door also started choking and crying. Our throats have been hurting. Some fell to the floor and vomited. I still have pain in my throat. There is no humanity for us here.
13. I have authorized my attorney to sign on my behalf, given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge.



Jeremy Jong signing on behalf of Sonia Lemus Tejada Dejaso

Date: 3/27/2020

EXHIBIT C

RESPONDENT'S PERSONAL DECLARATION

I, Donald Frazer, a/k/a Abby Frazer, hereby state under penalty of perjury that the following statements, made on March 21, 2020, are true and accurate to the best of my knowledge and belief:

BIOGRAPHIC INFO & GENDER IDENTITY

1. My legal name is Donald Frazer, but I use the name "Abby." I started using this name when I was 16 years old.
2. I was born in Kingston, Jamaica on August 5, 1996. From the time I was born, I lived with my mother and my younger sister. My mother, sister, and I lived in the Tel Aviv community in downtown of Kingston.
3. My father, Chicka, lived in a different community and I never had a relationship with him. Still I always heard that he was an area gang leader who had a reputation for violence and extortion. I was about six years old the last time I saw my father.
4. From a young age, I knew I was a woman. As a child, I always played with dolls with girls and never wanted to play with boys. I was 12 years old when I realized I was transgender. I started wearing my mother's clothes when she would leave the house. I would only wear her clothing when she was out and I would lock the door so I wouldn't be caught.
5. When I was 16 years old gang members in my community found out that I am transgender. They demanded that I leave or that they would kill me. They said that "batty-men" could not live in that area. They stabbed me.
6. For the next seven years I lived in the gully in Kingston.
7. The gully is an underground sewer system running throughout Kingston, it is also used for wastewater runoff and floods when it rains. It is common for LGBT youth and adults to live in the gully because there is nowhere else for us to go when we are kicked out of our homes and communities. The gully is cold, and filled with mosquitos, cockroaches, and rats. We sleep on pallets and cardboard.

Immigration History

8. In 2015 I applied for a visa to the US to visit my friend Fabian Gayle for Thanksgiving. I applied to stay for three weeks. I was interviewed about the visa application, and I was asked why I was staying for three weeks when Thanksgiving was just one day. My visa application was denied.
9. I fled Jamaica on July 31, 2019. I flew to Panama where I stayed several hours before flying to Mexico City. I took a bus for about three days to Tijuana. After presenting myself at the US border I stayed in a shelter for four months.

10. I entered the US on November 4, 2019 at the San Ysidro Port of Entry. I applied for asylum when I entered.

Medical History

11. I was 17 years old when I found out that I am HIV positive. Some medical providers came to the gully to conduct HIV testing. I knew right away that it would be impossible for me to get treatment for HIV while living in Kingston. All of the free medical providers are all located in ghettos and passing the violent men and gang members would be too great of a risk.
12. In 2017, I was waiting for my friend, Cavil, to come to the gully to bring me some food. A strange man came up and asked me for a light for his cigarette. I reached into my pocket for a lighter, when without warning, the man stabbed me in the belly with a ratchet (butterfly) knife. I remember that he yelled "batty-boy for dead" and ran away.
13. At the hospital, I experienced much discrimination. The doctors laughed when other patients said they did not want "batty boys" in the hospital. The doctor said I should stay two weeks, but I was afraid of the other patients, so I discharged myself the next day.
14. My blood was drawn at Cibola and I was told that I have a liver disease, hepatitis B, and HIV. In both 2019 and 2020 I have been told that my CD4 count is low, and that I must avoid infection.
15. I have been bleeding from my anus for months now, I am not sure why.

Procedural History in Detention

16. I was detained upon entry into the US on November 4, 2019.
17. On or about November 20, 2019 I was moved to the Cibola County Correctional Center and housed in the transgender unit.
18. On November 25, 2019 I was given a credible fear interview with an asylum officer. I passed the interview, being found credible, as a Jamaican sexual minority, with credible fear of persecution.
19. On December 5, 2019 I was issued a Notice to Appear for removal proceedings under §240 of the INA. The NTA charged me as an Arriving Alien.
20. On January 21, 2020, after several master calendar hearings, but before my individual merits hearing, I was transferred to the Aurora ICE Processing Center.
21. I submitted an I-589 to the Court on February 25, and I have an individual hearing scheduled with Judge Carbone at 1:00 pm on May 11, 2020 at the Aurora Immigration Court.

Care and Conditions at Cibola

22. When I was transferred to Cibola County Correctional Center, around November 20, 2019, I had my blood drawn. I was told that I have a liver disease, hepatitis B, and my HIV status was confirmed. However, I did not receive these results immediately.
23. Because I did not have results from my blood work I wrote a sick call request on December 2, noting that it had been two weeks and I had not received my results. I also wrote that I am HIV positive and was not receiving any medication including hormones. It was returned to me, stamped "received Dec. 8." I wrote another request on December 18 stating that I had done my blood test one month ago and I was not receiving any medication. I wrote again on December 23 stating "I am HIV positive am having bleeding from my anus and it really hurts and I have warts on my penis I need medical attention," which was marked as "received Dec 26."
24. I was eventually given medication for my liver disease at Cibola.
25. In late December I was taken to a specialist to see about my HIV. I was told that my CD4 count was low, and that I should avoid infections.
26. I was not given any HIV medication while I was at Cibola. I received no treatment for my bleeding anus, or for the warts on my penis.
27. In the trans pod at Cibola there were several rooms or cells that were unused. These were part of the larger unit and not part of the SHU detention. I asked if I could stay in one of the empty cells so that I could isolate myself to keep myself healthy. My request was denied.
28. A few days before I was transferred to Aurora I was prescribed an antibiotic by medical staff at Cibola.
29. On December 10, 2020 I requested my medical records from Cibola. I never received a response or a copy of my medical records.

Care and Conditions at Aurora

30. On January 21, 2020 I was transferred to the Aurora ICE Processing Center.
31. I was given a medical screening within two days of arriving at Aurora. I was told again that I have a liver disease, hepatitis B, and that my CD4 count was low. I believe the doctor said that my CD4 count is 38.
32. I was prescribed HIV medication which I now receive regularly. I do not know what my CD4 count is now or if it has improved. On or about March 17, 2020 I asked the nurse about getting my blood checked and she did not respond.


33. The food at Aurora is not good. Some days I do not eat because the food is so bad. A typical meal is bread, beans, and cake. I asked the kitchen staff for fruits and was told I can only get what is on the menu. I asked the medical staff about fruit and was told they could not help me with diet.
34. I have a medical appointment scheduled outside of the detention facility on Tuesday March 24, 2020. I am told that I may require emergency surgery for my anal bleeding.
35. The transgender women all stay in the one room together. Counting me, there are currently 10 people being detained together. We sleep in bunk beds.
36. Staff does not clean the room where we stay. We ask in the morning for disinfectant to clean with. I use shampoo to wash my hands with, but we do have bars of white soap. I wear gloves to wash my dishes.
37. We all eat in the same room where we sleep.
38. I have a large jacket, but the room is always cold. The water in the shower and sink are also very cold.

Care and Conditions at Aurora since COVID-19 pandemic

39. I first heard about the COVID-19 pandemic weeks ago because I am able to listen to the radio.
40. The first time I saw anything out of the ordinary at Aurora with respect to COVID-19 was Friday March 13, 2020. Staff came in with masks and had one transgender detainee change her clothes and her bedsheets. Then they took her away to quarantine. I heard that a lawyer was in Court who may have had COVID-19.
41. We were told about COVID-19 when they took away the one detainee for quarantine. We asked for hand sanitizer but were told to use the disinfectant spray. Staff had on masks, but detainees cannot get masks. We were told that if we get a fever or a cough we should write a note for medical attention.
42. Aurora staff screen one person from the transgender unit at random each day or each shift by taking their temperature.
43. On March 20, 2020, staff gave us a handbook on COVID-19. It is in English and Spanish and says how we should wash our hands and stay six feet away from other people.
44. It is impossible to stay six feet away from the people I am being detained with. We sleep in bunk beds, and often people gather near a television set. After March 13 we have been out to play volleyball together, just the 10 of us, and we were unable to keep 6 feet apart from each other.

45. Staff sometimes wear gloves and masks, but do not keep six feet apart from each other. I do not know how or if the staff is being screened. I do not know when the staff were told about COVID 19.
46. I clean everything because I fear getting an infection, but not everyone I am detained with is as careful about infection as I am.
47. All 10 of us take medication. I am one of two HIV positive women in the room. As of March 21, 2020 only the one person has been taken away for quarantine.
48. On Tuesday, March 17, we were woken up at 5:00 AM and told to get ready to move to a bigger room in Aurora because more transgender women were being transferred in. We waited sometime and then were told that the room was not clean and we would move on Thursday. On Thursday we were told we will be moving into a room that holds 18 of us on April 17.

RESPONDENT'S PERSONAL DECLARATION

A handwritten signature in black ink, appearing to read "D. Frazer", written over a horizontal line.

Donald Frazer, aka Abby Frazer

Signature of Respondent

EXHIBIT D

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

DADA, *et al.*,

Petitioners-Plaintiffs,

v.

WITTE, *et al.*,

Respondents-Defendants.

Case No:

**DECLARATION OF ATTORNEY
MARIEL VILLARREAL**

1 I, Mariel Villarreal, declare under penalty of perjury, pursuant to Title 28, Section 1746 of
2 the United States Code, that the following is true and correct to the best of my knowledge:

- 3 1. My name is Mariel Villarreal. I am an immigration attorney at non-profit organization
4 Pangea Legal Services, located at 350 Sansome St. Suite 650, San Francisco, CA 94104.
5 All times in this declaration will be in Pacific Standard Time, unless specified otherwise,
6 as that is the time zone in which I work.
- 7 2. Our office represents Jennifer Isabel Avalos Barrios (“Ms. Avalos Barrios”) in her
8 immigration proceedings. I am currently representing Ms. Avalos Barrios in her
9 proceedings before the LaSalle Immigration Court.
- 10 3. Ms. Avalos Barrios is a 24-year-old Guatemalan national who has been detained by
11 Respondents at the LaSalle Detention Facility since approximately December 11, 2019.
- 12 4. On March 25, 2020, I had a video teleconference (“VTC”) meeting scheduled with Ms.
13 Avalos Barrios via Skype at 9:00am PST (11:00am CT). I did not receive a call at the
14 scheduled time.
- 15 5. At 9:32am, I emailed the facility’s visitation request email address as well as Ms. Susan
16 Morris at Geo Group—with whom I have corresponded to set up VTC calls with Ms.
17 Avalos Barrios in the past—stating that I had not been called for my meeting.
- 18 6. At 9:42am, I received a text message from Ms. Avalos Barrios’s sister, Nereyda Avalos
19 Barrios, stating that her sister, Ms. Avalos Barrios, had called her extremely distraught
20 saying that officials in the detention center were letting out tear gas and that people were
21 fainting. In a second text message, Ms. Avalos Barrios’s sister told me that Ms. Avalos
22 Barrios said everyone was coughing and screaming.
- 23 7. At 10:05am, I called the Geo Group – Immigration and Customs Enforcement (“ICE”)
24 Processing Center in Jena, Louisiana. I left a voicemail message to which I did not receive
25 a call back.
- 26 8. At 10:08am, I emailed Ms. Morris and the visitation request email address again, stating
27 that I heard tear gas was used on individuals in the detention center and that I was
28

1 concerned for my client. I asked for more information. I did not receive a response to that
2 email.

- 3
4 9. At 11:50am, I received a call from Ms. Avalos Barrios from the LaSalle Detention
5 Facility. During our phone call, Ms. Avalos Barrios told me that she was not able to have
6 the VTC call with me that morning because she and the entire female population at
7 LaSalle Detention Facility had been tear gassed.
- 8 10. Ms. Avalos Barrios proceeded to tell me that the approximately 80 women detained at the
9 LaSalle Detention Facility were receiving a presentation from officers about COVID-19.
10 Ms. Avalos Barrios informed me that during the presentation, the women had questions
11 about the virus and were expressing fears about their safety in the detention center. Ms.
12 Avalos Barrios stated that the women's questions were going unanswered and their
13 concerns were being ignored by the officers.
- 14 11. Ms. Avalos Barrios then informed me that the officers grew impatient and angry with the
15 women and released tear gas into the room where they were giving the presentation. The
16 officers promptly left the room and locked the doors.
- 17 12. Ms. Avalos Barrios told me that her and the rest of the women were left locked inside the
18 room with tear gas for approximately one hour. She stated that the women were screaming
19 to be let out of the room, but no one came to their aid.
- 20 13. Ms. Avalos Barrios stated that the women were coughing, crying, and that some fainted
21 throughout the approximately one hour that they were locked in the room with tear gas.
- 22 14. Ms. Avalos Barrios said that after approximately one hour, officers came and unlocked the
23 doors, and they entered wearing full protective face gear to prevent effects of the tear gas.
- 24 15. Ms. Avalos Barrios informed me that, as we were speaking, her eyes were red and burning
25 and that her whole neck area and throat were in pain.
- 26 16. In the middle of our conversation, the call was lost and I did not receive a call back from
27 Ms. Avalos Barrios. I called the ICE Processing Center to attempt to be reconnected with
28 Ms. Avalos Barrios, but I was informed that it was not possible at that time.

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Dated: April 1, 2020

Respectfully submitted,

Oakland, California

/s/Mariel Villarreal

Mariel Villarreal
Pangea Legal Services
Immigration Attorney
Pangea Legal Services
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