

6. I was transferred to Winn in or about June 2019. The officers at Winn used to pass by the front door of the dormitories about

13. Once you have completed the form, you must once again notify ICE in a written request through the mailbox that the form is ready to be retrieved. Then, an officer or assistant eventually comes to pick it up. Sometimes that officer will discuss the answers to your questions, other times not. If the ICE officer does decide to ask you questions, they usually do not speak Spanish and do not provide you with an interpreter. It is not necessarily the case that the officer who provides you this “parole interview” is your assigned Deportation Officer (DO).
14. I have experienced and witnessed many issues in attempting to seek release on parole. The last time I submitted a parole interview form and packet was on March 10, 2020 to my then-assigned DO, Officer Paredes. However, on March 12, 2020, DO Paredes and the other DOs from that time period left, and new ones arrived. Eventually, I was able to ask my newly assigned DO about the status of my previously submitted parole request. He informed me that it was denied, once again because ICE considers me to be a flight risk. He told me he would provide me the denial letter for this denial. Now he has also left, and he never provided me the denial letter.
15. In the months after the September 5, 2019 order, I made several attempts to apply for parole. During one particularly frustrating attempt, I submitted a thorough parole packet, with many documents. However, after the DOs shifted, the new DO informed me that he did not see any of my documents and had no idea where my parole packet was. I had to begin the process of collecting documents from within this jail all over again, including original notarized letters from my proposed sponsors and other letters of support.
16. On another occasion when I was provided a denial letter, an ICE officer personally handed me two pieces of paper in English that had a checkmark in a box on it. He did not provide me a Spanish translation. I asked the officer what it meant, and he said that it meant I was denied. I asked him why I had been denied, and he said it was because I was a flight risk. I then asked the officer if it said why they thought I was a flight risk. The officer said that the document had no further explanation.
17. I could not understand why ICE would think I am a flight risk, when I submitted all the evidence of my proposed sponsor’s financial ability to support me and receive me in their home as well as evidence of my good moral character. I have asked several officers what more I can provide to prove that I am not a flight risk and they simply do not answer or

they tell me it is not in their control, but up to their supervisors, so they cannot answer me.

18. I asked one officer, whose last name I believe is De Mario, if he could review my documents and tell me why I had been denied, and he said,

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VERIFICATION

I, [REDACTED], am the individual referred to as R.C.L. 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 23, 2020