

solitary confinement for requesting information about parole and refusing to eat their food. I met immigrants in Bossier who arrived healthy and left the facility with severe mental health problems.

Impediments to Parole Access After the September Preliminary Injunction

9. At Bossier, I received a second parole advisal in English. I only learned about the meaning of this document when a representative of the Southern Poverty Law Center, came to Bossier near the end of September 2019 and explained to me the meaning of the document.
10. Now understanding it was my right to request a parole redetermination, I submitted a parole request in December 2019 by putting my request in a box labeled _____ as I had been instructed. When I received no receipt or reply for about two weeks, I handed in another copy of my request directly to an ICE officer. This request contained all the necessary documentation about my sponsor, my clean criminal record from Cuba, letters of support, and other evidence. ICE already had my passport in its custody. In response to my parole request, I received another parole denial letter. Again, the letter stated that I was determined _____ enumerated parole requirements. No further explanation was provided.
11. I was transferred to River Correctional Center (River) in January 2020. It was in River that I had my asylum hearing on January 10, 2020. I was denied asylum. I decided to appeal the decision because I was not provided a fair hearing, and I simply cannot return to Cuba.
12. In River, near the end of January, I requested a parole redetermination with additional documents, including more proof of community support and updated information _____ care for me.

13. I was transferred to Catahoula Correctional Center (Catahoula) in February 2020. Here, an officer physically showed me a copy of a parole advisal in English, but he did not provide me a copy, even after I asked for one. I was provided a brief parole interview, during which an ICE officer asked me about my sponsor and support if released on parole. About two weeks later, I once again received a letter in English denying me parole.

14. The letter box was checked off that I cannot

16.

my parole request have still not been returned to me, they will be.

This new parole request is very thorough and contains copies of: my Cuban passport and birth certificate; my clean criminal history document; a new letter of support from my Lawful Permanent Resident cousin and proposed sponsor; her income information and other supporting documentation, including various letters of support from US citizen and permanent resident community members in Florida who are eager to support me once if released from ICE custody. It also contains an article about the Preliminary Injunction in the *Heredia Mons* case and articles about the risk of COVID-19 for detained people and individuals living in Louisiana. I continue to await any response from ICE.

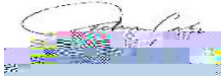
cousin, where I can self-quarantine and see a doctor about my fractured foot that continues to hurt intensely.

22. By patiently waiting for three months at the US-

VERIFICATION

I, [REDACTED], am the individual referred to as Y.P.T. 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.



Jaclyn Cole

On behalf of witness [REDACTED]

Date: April 28, 2020